

ApexBet Gaming N.V.

Anti-Money Laundering / Counter-Terrorist Financing / Counter-Proliferation Financing

Compliance Policy

Company Name: ApexBet Gaming N.V.

Brand: ApexBet

Jurisdiction: Curaçao

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This Policy, together with Annexes A–G attached hereto, forms an integral and inseparable part of the AML/CTF/CPF compliance framework of ApexBet Gaming N.V. (hereinafter referred to as “ApexBet”).

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Chapter 1 – Purpose and Scope

This Policy aims to establish and govern the compliance framework of ApexBet for the prevention of money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction in connection with its online gambling operations conducted under the ApexBet brand.

This Policy applies to:

1. All online gambling activities conducted by ApexBet;
2. All directors, senior management, employees, contractors, and outsourced service providers of ApexBet who are involved in customer onboarding, transactions, payments, or data processing;
3. All systems, accounts, payment processes, fund flows, and related data processing mechanisms used by ApexBet in the provision of gambling services.

Chapter 2 – Legal Basis and Regulatory Alignment

ApexBet confirms that its AML/CTF/CPF compliance framework has been established and is implemented in accordance with, and for the purpose of complying with, the applicable laws and regulations of Curaçao, including but not limited to:

1. The Regulation on the Prevention of Money Laundering, Terrorist Financing and Proliferation Financing (January 2025);
2. The National Ordinance for the Identification of Clients (NOIS);
3. The National Ordinance for the Reporting of Unusual Transactions (NORUT);
4. Applicable sanctions legislation of the Kingdom of the Netherlands and Curaçao.

This Policy and all Annexes attached hereto constitute the core internal compliance documentation through which ApexBet fulfils its statutory AML/CTF/CPF obligations.

Chapter 3 – Risk-Based Approach

ApexBet applies a documented and auditable risk-based approach in the design, implementation, and ongoing operation of its AML/CTF/CPF compliance framework.

The risk-based approach is based on the following principles:

1. Risks related to customers, products, services, transactions, and delivery channels are assessed prior to establishing a business relationship;
2. The depth of customer due diligence, level of transaction monitoring, and degree of manual intervention are applied proportionately to the identified risk level;
3. High-risk customers, transactions, and scenarios are not managed solely through automated processes;
4. Risk assessment outcomes are continuously applied throughout the customer lifecycle and transaction monitoring processes.

The risk-based approach is implemented and documented through the following policies and procedures:

- Business Risk Assessment (Annex A);
- Customer Risk Assessment Methodology (Annex B);

- Customer Due Diligence and Enhanced Due Diligence Procedures (Annex C);
 - Transaction Monitoring Rules (Annex D);
 - Sanctions and Politically Exposed Persons Screening Policy (Annex E);
 - Suspicious Transaction Reporting Procedure (Annex F);
 - AML/CTF Governance Framework (Annex G).
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Chapter 4 – Governance Structure, Roles and Responsibilities

Senior management of ApexBet bears ultimate responsibility for the effectiveness of the AML/CTF/CPF compliance framework.

ApexBet appoints an AML/CTF Compliance Officer with sufficient authority, independence, and expertise. The Compliance Officer is responsible for, including but not limited to:

1. Overseeing the implementation of this Policy and all Annexes;
2. Having access to all customer, transaction, payment, and fund flow information necessary to perform AML/CTF duties;
3. Independently assessing suspicious activities and determining whether a suspicious transaction report should be submitted;
4. Reporting significant AML/CTF matters directly to senior management.

All high-risk matters, significant anomalies, and key compliance decisions shall be subject to escalation, approval, and proper documentation.

Chapter 5 – Customer Due Diligence and Ongoing Monitoring

ApexBet conducts customer due diligence (CDD) when establishing and maintaining business relationships in order to:

1. Identify and verify the identity of customers;
2. Understand the purpose and intended nature of the business relationship;
3. Identify, assess, and manage money laundering and financing risks;
4. Conduct ongoing monitoring throughout the business relationship.

Where a customer is classified as high risk, or where legally required trigger events occur, ApexBet applies enhanced due diligence (EDD).

The specific triggers, measures, approval requirements, and documentation standards for CDD and EDD are set out in Annex C.

Chapter 6 – Transaction Monitoring and Detection of Unusual Activities

ApexBet conducts ongoing monitoring of customer transactions and behavior through a combination of automated monitoring rules and manual review.

All alerts generated by monitoring systems or identified through manual review are investigated and documented, including the trigger, analysis performed, and conclusions reached. Where appropriate, matters are escalated to the Compliance Officer and may result in enhanced due diligence, account restrictions, or the submission of a suspicious transaction report.

The detailed transaction monitoring rules, alert scenarios, investigation procedures, and record-keeping requirements are set out in Annex D (Transaction Monitoring Rules).

Chapter 7 – Sanctions and Politically Exposed Persons Screening

ApexBet conducts sanctions and politically exposed persons (PEP) screening at the following stages:

1. Customer onboarding;
2. Material changes to customer information;
3. Periodic reviews;
4. Prior to processing any customer withdrawal.

Any potential matches are escalated, reviewed, and documented, and appropriate measures are taken, including account restrictions, freezing of funds, or reporting, as further detailed in Annex E.

Chapter 8 – Suspicious Transaction Reporting and Confidentiality

Where there is reasonable suspicion of money laundering, terrorist financing, or proliferation financing, the Compliance Officer assesses the relevant circumstances and submits a suspicious transaction report to the Financial Intelligence Unit (FIU) in accordance with applicable legal requirements.

ApexBet strictly prohibits tipping-off and the disclosure of any information relating to suspicious transaction reports or related investigations to customers or third parties.

Chapter 9 – Training, Independent Testing and Record Keeping

ApexBet implements the following supporting measures:

1. AML/CTF/CPF training for relevant employees;
2. Appropriate screening of personnel involved in customer, transaction, or payment-related functions;
3. Periodic or ad hoc independent testing of the AML/CTF/CPF framework;
4. Retention of complete and auditable records relating to customers, transactions, risk assessments, and

reports to support regulatory supervision.

Chapter 10 – Change Management

ApexBet conducts updated risk assessments and revises relevant policies and procedures in the event of:

1. Introduction of new products or game types;
2. Introduction of new payment methods, including crypto-assets;
3. Entry into new markets or jurisdictions;
4. Significant changes to technology or system architecture.

Annex A

Business Risk Assessment

A.1 Purpose and Methodology

This Business Risk Assessment is designed to identify, assess, and document the inherent and residual risks of money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction arising from ApexBet's online gambling operations.

The assessment is conducted in accordance with a risk-based approach and considers, at a minimum:

- The likelihood of risks materialising;
- The potential impact of such risks;
- The effectiveness of existing control measures;
- The resulting residual risk after controls are applied.

Risk levels are classified as **Low**, **Medium**, or **High**, and each assessment outcome is supported by a written rationale. The results of this assessment are used to inform and calibrate customer due diligence measures, transaction monitoring rules, and other AML/CTF/CPF controls.

A.2 Business Model Risk

ApexBet operates a **business-to-consumer (B2C) online gambling model**, providing services directly to individual players via remote access.

Key characteristics of the business model include:

- Customer onboarding conducted remotely and online;
- No acceptance of cash transactions;
- No use of agents, intermediaries, or third parties to collect or receive funds;

- Prohibition of third-party or nominee account usage.

Inherent Risk Assessment: Medium

The inherent risk is assessed as medium due to the non-face-to-face nature of customer onboarding and the potential for cross-border access.

Risk Mitigation Measures:

- Mandatory customer due diligence and identity verification;
- Customer risk assessment and risk-based classification;
- Ongoing transaction and behavioral monitoring.

Residual Risk Assessment: Low to Medium

A.3 Product and Service Risk

ApexBet offers online sports betting and online casino products.

Certain products may exhibit characteristics such as:

- High betting frequency;
- Rapid or near-instant settlement;
- Multiple small-value transactions.

Inherent Risk Assessment: Medium

Risk Mitigation Measures:

- Betting limits and account-level controls;
- Monitoring of betting patterns and frequency;
- Investigation and escalation of abnormal betting behavior.

Residual Risk Assessment: Medium

A.4 Customer Risk

ApexBet's customer base consists exclusively of **natural persons** acting in a personal capacity.

Customer-related controls include:

- Prohibition of anonymous accounts;
- Mandatory identity and age verification;
- Prohibition of third-party account usage.

Inherent Risk Assessment: Medium

Risk Mitigation Measures:

- Customer risk assessment and risk-based categorisation;
- Sanctions and politically exposed persons (PEP) screening;

- Ongoing monitoring of customer transactions and behavior.

Residual Risk Assessment: Low to Medium

A.5 Geographic Risk

ApexBet assesses geographic risk based on applicable laws, sanctions regimes, and internal risk assessments.

The following measures are applied:

- Maintenance of permitted, restricted, and prohibited country lists;
- Technical and operational controls to restrict access from high-risk or sanctioned jurisdictions.

Inherent Risk Assessment: Medium

Residual Risk Assessment: Low

A.6 Payment Methods and Fund Flow Risk

ApexBet only offers payment methods that have been internally approved and assessed from an AML/CTF/CPF perspective.

Potential risks include:

- Lack of transparency regarding source of funds;
- Rapid deposit and withdrawal behavior.

Risk Mitigation Measures:

- Monitoring of transaction amounts, frequency, and patterns;
- Source of funds enquiries where appropriate;
- Investigation and escalation of unusual fund flows.

Inherent Risk Assessment: Medium

Residual Risk Assessment: Low to Medium

A.7 Review and Approval

This Business Risk Assessment is reviewed at least annually and updated whenever material changes occur, including but not limited to:

- Introduction of new products or services;
- Introduction of new payment methods;
- Significant changes to the business model or technology.

The assessment results are reviewed and approved by the AML/CTF Compliance Officer, and historical versions are retained for audit and regulatory purposes.

A.8 Technological Developments Risk Assessment

ApexBet continuously considers the impact of technological developments on money laundering, terrorist financing, and proliferation financing risks.

A technological risk assessment is conducted prior to, or in connection with, the following events:

1. Introduction of new payment methods or payment technologies, including crypto-assets;
2. Launch of new products, games, or transaction mechanisms;
3. Material changes to customer identification, device recognition, or access control technologies;
4. Significant changes to transaction monitoring or risk management systems.

Each technological risk assessment includes, at a minimum:

- A description of the technological change and its business scope;
- Identification of potential misuse for ML/TF/CPF purposes;
- Existing or proposed mitigating controls;
- Assessment of residual risk;
- Determination of whether updates to customer risk assessment, due diligence procedures, or transaction monitoring rules are required.

The outcome of each assessment is documented in writing and approved by the Compliance Officer prior to implementation or continued use of the relevant technology.

Annex B

Customer Risk Assessment Methodology

B.1 Purpose

This Customer Risk Assessment Methodology is designed to ensure that ApexBet systematically identifies, assesses, and manages the risks of money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction associated with its customers.

The outcome of the customer risk assessment is used to determine:

1. The level and scope of customer due diligence to be applied;
 2. Whether enhanced due diligence measures are required;
 3. The intensity and frequency of transaction monitoring;
 4. Whether escalation, additional controls, or approval by the Compliance Officer is required.
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B.2 Scope of Application

This methodology applies to:

1. All new customers at the time of onboarding;
 2. Existing customers during periodic reviews;
 3. Customers whose information, behavior, or transaction patterns change materially;
 4. Situations where new risk factors are identified or regulatory requirements change.
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B.3 Risk Assessment Factors

When assessing customer risk, ApexBet considers, at a minimum, the following risk factors. Additional factors may be applied where relevant to the business model or regulatory environment.

B.3.1 Customer Identity and Background Risk

- Customer's country of residence, nationality, or long-term location;
 - Whether the customer is a politically exposed person (PEP), a family member, or a close associate of a PEP;
 - Whether the customer is linked to a sanctioned individual or entity;
 - Completeness, consistency, and verifiability of the customer's identification information.
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B.3.2 Geographic Risk

- Countries or jurisdictions from which the customer accesses the services;
 - Whether such jurisdictions are identified as high-risk, sanctioned, or subject to weak AML controls;
 - Indicators of cross-border access or use of anonymisation tools such as VPNs.
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B.3.3 Payment Method Risk

- Types of payment methods used by the customer;
 - Frequency of changes to payment instruments;
 - Indicators that funds may be provided by third parties;
 - Degree of anonymity or limited traceability associated with the payment method.
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B.3.4 Behavioral and Transaction Risk

- Betting frequency, betting amounts, and changes in betting behavior;
 - Betting patterns that are inconsistent with the customer's historical activity;
 - Rapid deposit and withdrawal activity;
 - Indicators of transaction structuring or attempts to evade monitoring thresholds.
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B.3.5 Historical Risk Indicators

- Previous transaction monitoring alerts;
 - Prior application of enhanced due diligence measures;
 - Previous submission of suspicious transaction reports;
 - Outcomes of past investigations and actions taken.
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B.4 Risk Scoring and Classification

Based on the assessment of the above risk factors, ApexBet assigns each customer to one of the following risk categories:

1. Low-Risk Customers

- Limited or low-impact risk indicators;
- Standard customer due diligence and routine transaction monitoring apply.

2. Medium-Risk Customers

- Presence of identifiable risk factors;
- Enhanced monitoring and periodic review may be applied.

3. High-Risk Customers

- Significant risk indicators or multiple risk factors combined;
- Enhanced due diligence is mandatory and subject to review or approval by the Compliance Officer.

Customer risk classifications and the rationale for such classifications are documented and retained.

B.5 Application of Risk Assessment Results

The results of the customer risk assessment directly influence:

1. The depth and frequency of customer due diligence measures;
 2. Transaction monitoring thresholds and alert rules;
 3. The requirement for enhanced due diligence;
 4. The application of account restrictions or escalation procedures.
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B.6 Review and Adjustment of Risk Classification

Customer risk classifications are reviewed and updated in the following circumstances:

1. Material changes in customer behavior or transaction patterns;
2. Changes or additions to payment methods;
3. Updates to sanctions or PEP screening results;
4. Repeated transaction monitoring alerts;
5. Identification of new risk indicators;

6. Changes in applicable laws, regulations, or internal policies.

Any adjustment to a customer's risk classification is documented, including the reasons for the adjustment and the assessment performed.

B.7 Record Keeping

All records related to customer risk assessments, including initial assessments, periodic reviews, and risk reclassifications, are retained in accordance with applicable legal and regulatory requirements and are made available for regulatory inspection upon request.

Annex C

Customer Due Diligence and Enhanced Due Diligence Procedures

C.1 Timing of Customer Due Diligence

ApexBet conducts customer due diligence (CDD) at the following points in time:

1. Upon customer registration and prior to account activation;
2. Prior to permitting the customer to make any withdrawal;
3. When predefined internal risk thresholds are reached;
4. When required by the outcome of the customer risk assessment.

No customer is permitted to access full account functionality or withdraw funds until the required customer due diligence measures have been completed.

C.2 Scope of Customer Due Diligence Measures

Customer due diligence measures include, at a minimum:

- Collection and verification of valid identification documents;
- Verification of the customer's age;
- Verification of the consistency between the customer's identity and account information;
- Understanding the purpose and intended nature of the business relationship.

CDD measures are applied in a manner proportionate to the assessed risk level of the customer.

C.3 Enhanced Due Diligence Triggers

Enhanced due diligence (EDD) is applied where higher risk is identified, including but not limited to the following situations:

- The customer is classified as high risk;
 - The customer is identified as a politically exposed person (PEP), or a family member or close associate of a PEP;
 - A potential sanctions match is identified;
 - Unusual or suspicious transaction patterns or behavior are detected.
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C.4 Enhanced Due Diligence Measures

Enhanced due diligence measures may include one or more of the following actions:

- Requesting additional information or documentation from the customer;
- Conducting enhanced analysis of the customer's transaction history and behavior;
- Performing additional verification steps to confirm the customer's identity or source of funds;
- Requiring review and approval by the Compliance Officer to continue or establish the business relationship.

All EDD measures and decisions are documented in writing.

C.5 Ongoing Due Diligence

ApexBet conducts ongoing due diligence throughout the duration of the business relationship.

Ongoing due diligence includes:

- Continuous monitoring of customer transactions and behavior;
 - Periodic review of customer information and risk classification;
 - Updating customer due diligence records where necessary to ensure they remain accurate and up to date.
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C.6 Identification of Beneficial Owners and Persons Exercising Control

Although ApexBet primarily provides services to natural persons, ApexBet takes reasonable measures to identify and assess the beneficial owner or person exercising control over an account in the following circumstances:

1. Indications that funds are provided by a third party;
2. Evidence suggesting that an account is controlled or operated on behalf of another person;
3. Multiple accounts exhibiting strong links through devices, payment instruments, contact details, or behavioral patterns;

4. Statements or information indicating that the customer is acting on behalf of another individual or legal entity.

In such cases, ApexBet may require the customer to provide additional declarations, source of funds information, or supporting documentation and will assess whether the business relationship may continue.

C.7 Completion Requirements and Timelines

ApexBet ensures that customer due diligence is completed:

1. Prior to establishing the business relationship;
2. Prior to allowing any withdrawals;
3. When internal risk thresholds or trigger events are met;
4. When a customer's risk classification changes materially.

Where required CDD or EDD measures cannot be completed within a reasonable timeframe, ApexBet restricts account functionality or terminates the business relationship and documents the decision taken.

C.8 Simplified Due Diligence

As a general principle, ApexBet applies standard or enhanced due diligence to online gambling customers.

Simplified due diligence is applied only where permitted by applicable law and where a documented risk assessment confirms a low level of risk. Any application of simplified due diligence is subject to approval by the Compliance Officer and is documented accordingly.

C.9 Existing Customers

ApexBet ensures that existing customers remain subject to the customer due diligence and monitoring requirements set out in this Policy and this Annex.

Customer due diligence is refreshed or updated for existing customers where:

1. Customer information changes materially;
 2. Customer transaction or behavioral patterns change significantly;
 3. New risk factors are identified;
 4. Applicable laws, regulations, or internal policies are updated.
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C.10 Termination of the Business Relationship

Where ApexBet decides to terminate a business relationship with a customer, the following steps are taken:

1. Restriction or closure of the customer account;
2. Assessment of whether a suspicious transaction report is required;
3. Handling of any remaining funds in accordance with applicable laws and regulations;
4. Retention of all relevant investigation, decision-making, and communication records.

C.11 Use of Third-Party Service Providers

Where ApexBet uses external service providers to support identity verification, sanctions screening, or risk assessment processes, such providers act solely as support functions.

ApexBet retains ultimate responsibility for compliance with customer due diligence obligations and for the effectiveness of all CDD and EDD measures.

Annex D

Transaction Monitoring Rules

D.1 Monitoring Framework

ApexBet has established and maintains an ongoing transaction monitoring framework designed to identify, assess, and manage transactions and behaviors that may be associated with money laundering, terrorist financing, or the financing of the proliferation of weapons of mass destruction.

The transaction monitoring framework is implemented through a combination of:

1. Automated transaction monitoring rules;
2. Behavioral analysis and pattern recognition;
3. Manual review and investigation;
4. Risk-based calibration of monitoring intensity.

Transaction monitoring applies throughout the entire customer lifecycle and covers, at a minimum, deposits, betting activity, transfers, withdrawals, and overall account behavior.

D.2 Monitoring and Alert Scenarios

ApexBet maintains a set of predefined monitoring and alert scenarios designed to identify potentially unusual or suspicious transactions or behaviors, including but not limited to the following:

1. Rapid deposit and withdrawal of funds, in whole or in substantial part, within a short period of time;
2. Betting frequency, bet sizes, or betting patterns that are inconsistent with the customer's historical activity;
3. Repeated small-value transactions or structuring intended to evade monitoring thresholds;
4. Abnormal linkages or coordinated activity between multiple customer accounts;
5. Frequent changes to payment methods or use of multiple payment instruments without a reasonable explanation;

6. Abuse of bonuses, promotions, or arbitrage strategies to facilitate abnormal transactions;
7. Access from, or transaction activity associated with, high-risk, restricted, or sanctioned jurisdictions;
8. Any other transactions or behaviors identified as unusual based on risk assessments or professional judgment.

Monitoring scenarios are reviewed and updated periodically to reflect changes in the business model, risk assessments, typologies, and regulatory expectations.

D.3 Investigation and Analysis Process

Where a transaction or behavior triggers an alert, ApexBet initiates an investigation process, which includes:

1. Reviewing the specific trigger and circumstances that generated the alert;
2. Analyzing the relevant account's transaction history, behavioral patterns, and risk classification;
3. Requesting additional information or clarification from the customer where appropriate;
4. Assessing whether there is reasonable suspicion of money laundering, terrorist financing, or proliferation financing.

The investigation process, findings, and conclusions are documented in writing, including the rationale for any actions taken.

D.4 Escalation and Remedial Actions

Where an investigation indicates elevated risk or reasonable suspicion, the matter is escalated to the AML/CTF Compliance Officer.

The Compliance Officer may determine to take one or more of the following actions:

1. Apply enhanced due diligence measures;
2. Restrict account functionality or suspend transactions;
3. Terminate the business relationship;
4. Submit a suspicious transaction report to the Financial Intelligence Unit;
5. Apply other appropriate risk mitigation measures in accordance with applicable law.

All escalation decisions and remedial actions are documented and retained.

D.5 Record Keeping

All records relating to transaction monitoring, including alerts, investigations, analysis, escalation decisions, and outcomes, are retained in accordance with applicable legal and regulatory requirements and are made available for regulatory inspection upon request.

Annex E

Sanctions and Politically Exposed Persons Screening Policy

E.1 Purpose

This Policy is designed to ensure that ApexBet complies with all applicable sanctions laws and regulations and effectively manages the risks of money laundering, terrorist financing, and proliferation financing associated with sanctioned persons, entities, and politically exposed persons (PEPs).

Through the implementation of sanctions and PEP screening measures, ApexBet seeks to identify, assess, and mitigate relevant financial crime risks.

E.2 Scope of Screening

ApexBet conducts sanctions and PEP screening in respect of the following:

1. All new customers at the time of onboarding;
2. Existing customers during periodic reviews;
3. Customers whose personal or account information changes materially;
4. Prior to processing any customer withdrawal;
5. Where unusual activity, transaction alerts, or other risk indicators arise.

Screening may also extend, where appropriate, to beneficial owners, persons exercising control, or related parties associated with the customer.

E.3 Screening Sources

ApexBet uses reliable and up-to-date sanctions and PEP screening sources, which may include:

- United Nations sanctions lists;
- European Union sanctions lists;
- Sanctions lists applicable within the Kingdom of the Netherlands and Curaçao;
- Reputable commercial sanctions and PEP databases, where applicable.

Screening tools and data sources are reviewed and updated on a regular basis to ensure accuracy and completeness.

E.4 Handling of Screening Matches

Where screening results indicate a potential sanctions or PEP match, ApexBet applies the following process:

1. Conducts a manual review to determine whether the match is a true or false positive;
2. Escalates confirmed or highly probable matches to the AML/CTF Compliance Officer;
3. Assesses the associated risk and determines appropriate control measures.

All screening results, reviews, and decisions are documented and retained.

E.5 Sanctions Screening Prior to Withdrawals

Prior to processing any customer withdrawal, ApexBet performs sanctions and PEP screening to confirm the customer's current status.

Where a potential sanctions match is identified during pre-withdrawal screening, the withdrawal request is automatically blocked and escalated for further review until the matter is resolved in accordance with legal requirements.

E.6 Freezing Measures

Where a customer or related party is confirmed to be subject to applicable sanctions, or where freezing of funds is otherwise required by law, ApexBet shall:

1. Immediately freeze the relevant account or funds;
2. Prevent any further transactions or withdrawals;
3. Restrict account functionality as required;
4. Ensure that freezing measures are implemented in accordance with applicable legal and regulatory obligations.

The implementation and lifting of any freezing measures are documented in full.

E.7 Reporting Obligations

Where required by applicable laws and regulations, ApexBet reports sanctions matches, freezing actions, or related matters to the relevant competent authorities or the Financial Intelligence Unit.

Reports are submitted in the manner and within the timeframes prescribed by law.

E.8 Record Keeping

All records related to sanctions and PEP screening, including screening results, reviews, freezing actions, and reports, are retained in accordance with applicable legal and regulatory requirements and are made available for regulatory inspection upon request.

Annex F

Suspicious Transaction Reporting Procedure

F.1 Purpose

This Procedure sets out the process by which ApexBet identifies, assesses, and reports transactions or activities that may be related to money laundering, terrorist financing, or the financing of the proliferation of weapons of mass destruction.

The objective of this Procedure is to ensure that ApexBet fulfils its legal obligation to report suspicious transactions to the Financial Intelligence Unit (FIU) in a timely, accurate, and confidential manner.

F.2 Identification of Suspicious Transactions

Suspicious transactions or activities may be identified through, but are not limited to, the following sources:

1. Alerts generated by automated transaction monitoring systems;
2. Manual reviews conducted by employees in the course of their duties;
3. Sanctions or politically exposed persons screening results;
4. Customer behavior or transaction patterns that are inconsistent with known customer information or expected activity.

All identified suspicious indicators are subject to internal assessment.

F.3 Internal Reporting and Escalation

Where an employee or system identifies a potentially suspicious transaction or activity, the relevant information is submitted through the established internal compliance reporting channels to the AML/CTF Compliance Officer.

Internal reports include, where available:

- Identification of the customer and relevant account(s);
 - Description of the transaction(s) or activity giving rise to suspicion;
 - The reason(s) for suspicion;
 - Any supporting documentation or information.
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F.4 Investigation and Assessment

The AML/CTF Compliance Officer is responsible for investigating and assessing reported suspicious transactions or activities.

The investigation includes, as appropriate:

1. Review of the customer's transaction history and behavior;
2. Assessment of the customer's risk profile and background information;
3. Requests for additional information or clarification, where appropriate;
4. Evaluation of whether there is reasonable suspicion of ML/TF/CPF.

The investigation process and conclusions are documented in writing.

F.5 Decision and Submission of Suspicious Transaction Reports

Where the AML/CTF Compliance Officer determines that there is reasonable suspicion, a suspicious transaction report is submitted to the Financial Intelligence Unit in accordance with applicable legal requirements.

Reports contain all relevant facts, analysis, and supporting information and are submitted in the prescribed format and within the legally required timeframe.

F.6 Prohibition of Tipping-Off

ApexBet strictly prohibits the disclosure to customers or any third parties of:

1. The existence of a suspicious transaction investigation;
2. The submission or intended submission of a suspicious transaction report;
3. Any information that could compromise an investigation or regulatory process.

Any breach of the prohibition on tipping-off may result in disciplinary action and legal consequences.

F.7 Record Keeping

All records relating to the identification, internal reporting, investigation, assessment, and external reporting of suspicious transactions are retained in accordance with applicable legal and regulatory requirements and are made available for regulatory inspection upon request.

Annex G

AML/CTF Governance Framework

G.1 Purpose of the Governance Framework

This Governance Framework establishes the structure through which ApexBet ensures effective oversight, accountability, and implementation of its AML/CTF/CPF compliance obligations.

The framework is designed to support the effective prevention, detection, and reporting of money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction.

G.2 Senior Management Responsibility

Senior management of ApexBet bears ultimate responsibility for the effectiveness of the AML/CTF/CPF compliance framework.

Senior management responsibilities include, but are not limited to:

1. Approving and supporting the implementation of this Policy and all related Annexes;
 2. Ensuring that sufficient resources are allocated to maintain an effective AML/CTF/CPF framework;
 3. Overseeing the overall effectiveness of AML/CTF/CPF controls and risk management;
 4. Reviewing significant AML/CTF/CPF matters, risk assessment outcomes, and key compliance decisions, where appropriate.
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G.3 AML/CTF Compliance Officer

ApexBet appoints an AML/CTF Compliance Officer with sufficient authority, independence, and professional expertise to carry out AML/CTF/CPF responsibilities effectively.

The responsibilities of the Compliance Officer include, but are not limited to:

1. Overseeing and coordinating the implementation of the AML/CTF/CPF Policy and all related procedures;
2. Having access to all customer, transaction, payment, and fund flow information necessary to perform AML/CTF/CPF duties;
3. Assessing suspicious transactions and other high-risk matters and determining whether a suspicious transaction report should be submitted;
4. Reporting material AML/CTF/CPF matters directly to senior management;
5. Acting as the primary point of contact with regulatory authorities and the Financial Intelligence Unit.

The Compliance Officer performs these duties independently and without undue influence.

G.4 Escalation and Decision-Making Mechanisms

Matters are escalated to the Compliance Officer or senior management where they involve:

1. High-risk customers or transactions;
2. Confirmed sanctions or PEP matches;
3. Situations requiring the submission of a suspicious transaction report;
4. Any other matter that may have a material impact on ApexBet's AML/CTF/CPF obligations.

All escalations, investigations, decisions, and actions taken are documented and retained.

G.5 Ongoing Operation of the Governance Framework

ApexBet periodically reviews the operation of its AML/CTF Governance Framework to ensure that roles, escalation mechanisms, and decision-making processes remain effective.

The outcomes of such reviews may be used to improve the AML/CTF/CPF framework and are reported to senior management where appropriate.