

SCULPTURE N.V.

AML/CFT Procedures

This Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) has been prepared in strict adherence to the requirements and guidance issued by the Curacao Gaming Authority (CGA). The assessment is aligned with the principles outlined in the applicable anti-money laundering and counter-terrorist financing (AML/CTF) regulatory framework of Curacao and is intended to demonstrate the company's commitment to robust risk management and regulatory compliance. This document is addressed exclusively to the relevant regulatory authority and is submitted in strict confidence. It contains sensitive and proprietary information and must not be disclosed, reproduced, or distributed without the express written consent of the company.

Version Control

Version	Date	Owner	Status
1.0	28-05-2025	Compliance Officer	Approved
2.0	07-05-2026	Compliance Officer	Approved

Change and Review History

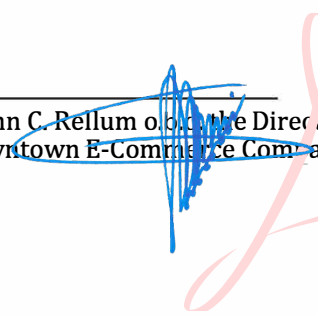
Version	Date	Description of Changes	Reviewed/Approved By	Author
1.0	28-05-2025	Policy Creation and Approval	Compliance Officer	Kateryna Veremiyenko
2.0	11-05-2026	Updated policy in line with CGA Updates and integrated the BRA, CRA and Risk Assessment Matrix.	Compliance Officer	Kateryna Veremiyenko

Policy Approval

By signing this document, the undersigned acknowledge and approve the implementation of these AML/CFT Procedures for Sculpture N.V.



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1. Introduction and Objectives

This document establishes a comprehensive framework for managing player settlements, authenticating player identities, and overseeing transactions to detect and deter fraudulent activities. It is designed to uphold the security and legitimacy of financial operations within the gaming platform.

Robust Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) measures play a pivotal role in protecting the financial infrastructure of the gaming sector. By implementing systems to identify, monitor, and prevent illegal financial behaviour such as money laundering and the financing of terrorism these measures reinforce the lawful operation of the platform. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Compliance with AML/CFT obligations also ensures adherence to the standards imposed by regulatory and financial oversight bodies. Failing to meet these obligations can lead to serious repercussions, including regulatory sanctions, legal proceedings, financial penalties, and reputational harm that can compromise the long-term viability of the operator.

Beyond compliance, strong AML/CFT protocols demonstrate a clear commitment to ethical conduct and responsible gaming. Such transparency fosters consumer confidence, reassuring players that the platform operates with integrity and in alignment with regulatory expectations.

Moreover, effective AML/CFT controls are crucial for mitigating internal risks associated with financial crime. Through detailed identity checks, systematic monitoring of transactions, and structured reporting of suspicious behaviour, gaming companies can minimize exposure to financial threats and regulatory breaches.

In essence, well-defined AML/CFT policies are fundamental to preserving the integrity of financial processes, maintaining legal compliance, enhancing consumer trust, and safeguarding against operational vulnerabilities in the gaming environment.

These procedures are developed in accordance with the legal framework of Curacao, specifically including but not limited to:

- the National Ordinance on the Reporting of Unusual Transactions (NORUT),
- the National Ordinance Identification for Services (NOIS),
- the National Ordinance on Money Laundering (LOK),
- the CGA Guidelines, the Sanctions Ordinance, and
- the Criminal Code.

1.1 What is the meaning of AML/CFT?

Money Laundering (ML) refers to the process through which individuals or entities conceal the origins of illegally acquired funds, making them appear legitimate. This illicit activity poses a serious threat to the integrity of financial systems and is often linked to broader

criminal enterprises. The laundering process generally unfolds across three key stages: This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Placement – Illicit proceeds are first introduced into the financial system, often through cash-heavy channels such as casinos, real estate, or other businesses with high volumes of cash transactions.

Layering – A series of complex transactions including fund transfers between accounts, currency conversions, international movements, and structured deposits are employed to obscure the illicit origin of the funds.

Integration – The 'cleaned' money is then reinvested into the formal economy through legitimate-looking ventures, such as property purchases, business investments, or luxury goods, making it extremely difficult to trace back to its criminal origin.

Although commonly associated with narcotics trafficking, money laundering also stems from crimes including human trafficking, fraud, corruption, arms smuggling, and large-scale tax evasion.

Terrorist Financing (TF) involves the collection or provision of financial resources to support terrorist individuals, groups, or activities. Unlike money laundering, TF often involves funds that originate from lawful sources such as donations, personal income, or legitimate business revenue but are ultimately used to fund unlawful terrorist acts. Methods of terrorist financing include the smuggling of cash, use of prepaid debit cards, structured transactions, informal value transfer systems, and wire transfers, with the primary focus being to conceal the destination of the funds rather than the source. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Proliferation Financing (PF) concerns the provision of financial resources for the production, acquisition, or dissemination of weapons of mass destruction (WMDs), including nuclear, biological, and chemical weapons. This form of financing is globally condemned due to the severe threat it poses to international peace and security, and is governed by strict sanctions frameworks and export controls. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Targeted Financial Sanctions (TFS) are legally binding measures requiring financial institutions and businesses such as casinos to freeze and block the assets of individuals, organizations, or entities designated by the United Nations Security Council or the European Union. In Curacao, adherence to these sanctions is legally mandated. Casinos are required to ensure that no funds, assets, or financial services are made available, directly or indirectly, to designated parties. They must also report any such occurrences to the Financial Intelligence Unit (FIU) and update their internal AML/CFT policies to reflect any changes to relevant sanctions lists. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

At Sculpture, we are fully committed to enforcing stringent Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), and Proliferation Financing (PF) controls. In alignment with Curacao's legal framework, our approach is proactive, risk-based, and regularly updated to identify, prevent, and report suspicious financial activities that could compromise the integrity of our operations or the global financial system. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

2. Responsibilities

The Compliance Department is the office responsible for the ongoing review, maintenance, and distribution of this policy. All updates must be coordinated through this office to ensure alignment with current regulatory requirements

The Compliance Officer Ms. Veremiyenko Kateryna is responsible for the comprehensive oversight of all player transactions and for ensuring the accurate verification of the identities of all registered users. This role involves establishing clear criteria and monitoring systems to swiftly detect any potentially suspicious behaviour or irregularities in player activity. In addition to identification, the Compliance Officer is also tasked with designing, implementing, and continuously refining protocols aimed at addressing such anomalies effectively. These measures are intended to minimize exposure to financial crime and ensure that risks related to money laundering and the financing of terrorism are mitigated to the lowest reasonably achievable level, in line with regulatory expectations and the Company's risk appetite.

3. Company Policy and Procedures

3.1 Suitability

To access the gaming services provided by Sculpture N.V., players must first complete a full account registration through the brand's official platform. Participation in any gaming activities, including placing wagers, is restricted exclusively to individuals who have successfully registered an account. Only upon completion of the registration process and the explicit acceptance of the platform's Terms and Conditions and Privacy Policy, are players granted access to deposit funds and engage in gameplay. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

As part of the account creation procedure, users are required to provide specific personal details that support both identification and verification measures in accordance with the company's compliance obligations. These required fields include:

- Full legal first and last name;
- A strong, secure password (entered twice for confirmation in line with the company's Information Security Policy);
- A valid email address;
- Date of birth;
- Country and place of residence;

- A mobile phone number, including the international dialing prefix associated with the selected country of residence.

The platform enforces strict age verification protocols, whereby players must be at least 18 years of age to register, in accordance with local legal mandates. The registration system is configured to automatically reject applications submitted by individuals who do not meet the legal age requirement. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

All players must personally complete the registration process on their own behalf. Third-party registration, whether by a family member, agent, or any other representative, is strictly prohibited. By completing the registration process, the player confirms and declares that they are registering solely for themselves. Any account identified as having been registered by a third party will be immediately suspended pending investigation and may be permanently deactivated in accordance with the Company's AML/CFT obligations.

Additionally, access is denied to individuals residing in countries classified as restricted jurisdictions due to local prohibitions or severe regulatory constraints regarding online gambling.

To enhance risk management and compliance with Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) obligations, the Company also performs background screening during registration to identify potential Politically Exposed Persons (PEPs). In the event a registrant is identified as a PEP, the Risk Manager will conduct a case-specific assessment to determine the appropriateness of account approval based on predefined risk evaluation criteria. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

3.2 Activation of Account

Prior a newly registered player is able to log in for the first time, an automated email containing an account activation link is sent to the email address provided during the registration process. This message serves solely to confirm the validity of the email and does not include any confidential or sensitive information, such as the player's username or password, thereby maintaining the integrity and security of the registration process. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

To activate their account, the player must click on the link included in the activation email. Only after successful activation will the player be granted access to their account dashboard and permitted to initiate their first deposit. The system is designed to block any deposit attempts from accounts that remain unverified or inactive, ensuring compliance with identity verification requirements and enhancing the security of the platform from the outset. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

3.3 Know Your Customer

In line with the regulatory requirements set forth by the National Ordinance on the Reporting of Unusual Transactions (NORUT) and the National Ordinance Identification for Services (NOIS), Sculpture N.V. places the highest priority on verifying the identity of its players. This process is fundamental for ensuring compliance with Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) obligations applicable in Curacao. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Accordingly, the Company requires all players to undergo identity verification when specific thresholds are met or certain risk indicators are triggered. Verification documents can be submitted either via the official customer support email listed on the Company's website or directly uploaded through the secure section of the player's registered account.

Acceptable identification documentation includes:

- A clear copy of a valid government-issued identification document (passport, ID card, or driver's license).
- Proof of address (e.g., a utility bill or official correspondence not older than three months).
- If applicable, a copy of the front and back of the payment card (with the middle eight digits and CVV/CVC code masked).
- Bank account statements or screenshots to confirm the origin of funds or ownership of the payment method used.

Implementation of Customer Due Diligence (CDD) is mandatory under the following circumstances:

- When a player engages in financial transactions totalling or exceeding NAf. 4,000 (approximately €2,000), whether in a single transaction or multiple linked transactions.
- When processing any occasional or one-time transaction that exceeds the above threshold.
- Whenever there are indicators or suspicions of money laundering or terrorist financing activity.
- If there is doubt about the validity, reliability, or adequacy of previously collected identification data.

Until a player's identity has been fully verified in accordance with these criteria, withdrawals will be strictly prohibited. Players are required to submit the requested verification documentation within a 30-day period from the date of request. Failure to do so may result in the temporary suspension or permanent deactivation of the account, in accordance with Curacao's licensing standards and the Company's internal AML policies. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Withdrawal Policy and Payment Method Verification: Withdrawals must be processed using the same method that was used to fund the account, in order to prevent misuse or third-

party transactions. If that method is unavailable, an alternative method previously used by the player or a secure bank transfer may be approved. In the case of bank transfers, staff are required to verify that the account belongs to the registered player. Cash withdrawals are strictly prohibited under Curacao's AML regime. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Ongoing Risk Assessment and Enhanced Due Diligence (EDD): As part of the Company's risk-based approach, all registered players are subject to ongoing risk assessment. Players identified as posing a higher risk due to factors such as transactional behaviour, country of origin, or source of funds will be required to undergo Enhanced Due Diligence. This includes, but is not limited to: This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

- Verification of ownership of all used payment instruments;
- Submission of documentary evidence confirming the source of funds or wealth;
- Additional scrutiny of account activity.

The Company ensures that all identity verification procedures and due diligence measures are implemented in a manner that is proportional to the risk presented, as mandated under Curacao AML/CFT legislation.

3.4 Risk Levels

Upon registration, each player is automatically assigned a risk classification within the system Level 1 (Low Risk), Level 2 (Medium Risk), or Level 3 (High Risk) based on preliminary KYC data and behavioral indicators.

Level 1 – Low Risk: These players are granted full access to gaming services once standard KYC verification is completed. Their account activity is monitored in real time by automated systems designed to detect unusual patterns, such as sudden spikes in deposits or wagers. Any anomalies trigger alerts for further review. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Level 2 – Medium Risk: In addition to standard monitoring, Medium Risk players are placed on a risk observation list reviewed weekly by management. Their withdrawal requests require prior approval from senior staff. Depending on the outcome of enhanced due diligence, they may be downgraded to Low Risk or escalated to High Risk based on emerging risk factors. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Level 3 – High Risk: Players classified as High Risk are restricted from all site activity until a comprehensive enhanced due diligence review is completed. If a player's risk level is upgraded to Level 3 after a withdrawal is initiated, the transaction is immediately paused pending verification. These players are also notified of the elevated risk status and required to submit further documentation, including a real-time photo with their ID in cases of

identity uncertainty. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Only designated personnel have the authority to adjust a player's risk level at any stage of the lifecycle.

3.5 Risk Base Verification

The depth of identification and verification procedures depends on the player's assigned risk level:

Low Risk: Basic verification is conducted by collecting and validating key personal details such as the player's full name, country and place of residence, and date of birth. This information is cross-checked to confirm identity before account functionality is enabled.

Medium Risk: Players assessed as Medium Risk must submit all information required for Low Risk verification, along with additional data including residential address, place of birth, and nationality. A valid government-issued photo ID (e.g., passport or driver's license) is required to support this information.

High Risk: For High Risk players, the verification process includes all steps outlined for Medium Risk profiles. However, additional scrutiny is applied. Depending on the nature of the risk, the Company may require further documentation or supporting evidence to fully validate identity and address any potential red flags.

Verification may be performed using official documents or credible third-party sources. If residential address information is not verifiable via submitted identification, the player must provide proof of address dated within the past six months. Acceptable documents include recent bank or utility statements, government-issued correspondence, or certified certificates of conduct.

To enhance verification reliability, the Company may also employ digital verification tools, including electronic IDs (e-ID), banking identity systems (Bank-ID), and reputable commercial databases. Daily monitoring processes such as IP analysis and geolocation tracking are conducted to detect inconsistencies.

Where standard methods fail to adequately confirm a player's identity or address, the Company escalates the case through Enhanced Due Diligence (EDD). This ensures a comprehensive and risk-sensitive verification approach is maintained in line with Curacao's regulatory expectations.

3.6 Medium and High Risk Customers

As part of its commitment to maintaining a secure and transparent remote gaming environment, the Company requires all players to open an account before accessing services. To further strengthen due diligence practices, the Company employs a customer risk profiling system, which is grounded in data-driven analysis. This system incorporates official economic and statistical indicators to construct behavioural benchmarks, enabling

the evaluation of player activity against expected norms. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

While routine transactions from customers not considered high risk do not warrant direct collection of Source of Wealth (SoW) information, this changes upon reaching Customer Due Diligence (CDD) thresholds. Once these thresholds are triggered, the approach to SoW varies based on the customer's risk classification:

Medium Risk Customers: For customers categorized as Medium Risk, the Company uses statistical models derived from country-specific median income data to form a baseline understanding of typical wealth patterns. As these models offer reliable insight, formal SoW declarations are generally not required. However, where such declarations are voluntarily provided or requested for specific purposes, players must disclose the origin of their wealth (e.g., salaried employment, self-employment, business ownership). The declared information must be coherent with the customer's observed behaviour throughout their relationship with the Company. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

High Risk Customers: Individuals assessed as High Risk are subject to enhanced scrutiny. In these cases, the Company requires a full Source of Wealth declaration, accompanied by verifiable documentation. Additionally, if customer behaviour deviates from established norms such as unusually large or frequent deposits the Company may also request Source of Funds (SoF) information. This includes specific details about the expected origin, value, and frequency of incoming funds. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

In all instances, the Company does not accept SoW or SoF declarations at face value. Claims must be corroborated with supporting evidence. For example, a customer citing employment as the origin of their wealth may be asked to provide recent bank statements, pay slips, or employment contracts as proof.

This structured approach ensures that customer profiles remain accurate, risk-sensitive, and compliant with Curacao's AML/CFT regulatory framework.

4. AML Procedures

All financial interactions between players and Sculpture must be conducted solely through the payment methods explicitly offered by the Company. These options may be updated at the Company's discretion. Under no circumstances are peer-to-peer (player-to-player) transfers allowed on the platform.

To uphold strict compliance with Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) regulations, every transaction is subject to systematic monitoring and risk-based analysis. This ensures the timely identification of patterns or activities indicative of money laundering or the financing of terrorism.

If credible information suggests that a player may be engaged in financial misconduct or illicit transactions, the Company will escalate the matter to the Financial Intelligence Unit (FIU) Curacao without delay. All suspicious activities are first reported to the Money Laundering Reporting Officer (MLRO) using the Suspicious Transaction Report (STR) framework. The MLRO will assess the situation and, if warranted, formally submit the case to the FIU. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

The MLRO is responsible for ensuring that the Company maintains and enforces effective AML/CFT systems in line with legal obligations and industry best practices. In the temporary absence of the MLRO such as during leave the Company Director will assume these responsibilities to maintain uninterrupted compliance oversight.

All transaction procedures, including AML-specific provisions, are detailed in the Company's Terms and Conditions. Any amendments to these policies are clearly communicated to all registered players in writing before such changes are implemented.

4.1 Training

In partnership with the Money Laundering Reporting Officer (MLRO) and any necessary external parties, comprehensive training sessions covering our Anti-Money Laundering and Counter Financing of Terrorism (AML/CFT) policies and procedures will be provided to all new hires and key collaborators.

New employees must complete this training within their first month of employment, followed by a quiz or test to assess their understanding. Upon successful completion, their participation will be confirmed by their direct manager, with proof securely stored in their employee file.

Moreover, all employees will review the training materials ahead of their annual performance evaluations. During these reviews, any relevant updates or changes to the policies and procedures will be communicated.

The training will ensure that employees fully understand the following key areas:

- Legal obligations regarding money laundering and the financing of terrorism.
- Their personal responsibilities under applicable regulations.
- Internal reporting procedures for relevant issues.
- The company's measures to prevent money laundering and terrorist financing.
- Protocols for identification, verification, record-keeping, and other preventative actions.
- Procedures for detecting and managing suspicious transactions.
- The potential personal liability for failure to report relevant information or suspicions, as required by regulations and internal policies.
- Current trends, techniques, and methodologies in the field of money laundering and terrorist financing.

4.2 Risk Calculation

The Company adopts a risk-based approach to Anti-Money Laundering and Counter Financing of Terrorism (AML/CFT), focusing on key risk indicators to ensure robust compliance. These practices align with AML best practices to prevent and detect financial crime:

- **FATF-Identified High-Risk Countries:** Countries flagged by the Financial Action Task Force (FATF) due to insufficient AML/CFT controls are subject to heightened scrutiny. Players attempting to register from these jurisdictions are either blocked from registering or automatically categorized as high-risk.
- **Internally-Identified High-Risk Countries:** Based on the company's own risk assessment, certain countries deemed to pose an elevated AML/CFT risk will automatically classify players from these regions as high-risk.
- **Large Transactions Within a 30-Day Rolling Window:** Transactions that exceed a significant threshold over a 30-day rolling period will trigger additional monitoring. Deposits are temporarily frozen, and enhanced due diligence (EDD) is required before funds can be released.
- **Risky Payment Methods:** Players utilizing high-risk payment methods, such as prepaid credit or debit cards, will be reclassified as high-risk to mitigate potential AML/CFT concerns.
- **Quarterly Risk Reviews by the MLRO:** The Money Laundering Reporting Officer (MLRO) conducts quarterly risk assessments to identify new and emerging risks. Any identified risks are promptly integrated into the Customer Due Diligence (CDD) framework, with relevant updates communicated to all staff members.
- **Monitoring of AML/CFT Warning Lists:** The company maintains and regularly updates a list of individuals and entities flagged in AML/CFT-related warning lists, ensuring enhanced monitoring and oversight of these subjects.
- **Verification of Source of Funds:** The company ensures thorough verification of the source of funds, particularly for players undergoing enhanced due diligence (EDD), to prevent illicit financial activity.

By incorporating these risk-based measures, the company maintains a comprehensive AML/CFT framework that proactively identifies and mitigates risks associated with money laundering and terrorist financing.

4.3 Politically Exposed Persons

In line with our commitment to stringent Anti-Money Laundering (AML) compliance, Sculpture N.V. enforces enhanced due diligence (EDD) procedures for foreign Politically Exposed Persons (PEPs), whether as customers or beneficial owners. These procedures include:

- **Risk Management Systems:** Robust systems are in place to identify whether a customer qualifies as a PEP, ensuring effective risk management from the outset.
- **Senior Management Approval:** Before establishing or continuing a business relationship, approval must be obtained from senior management or the Compliance department. This applies to both new and existing customers, as well as occasional transactions.

- **Verification of Source of Wealth and Funds:** We take reasonable steps to verify the origin of a PEP's wealth and funds. This includes requesting a declaration from the customer and cross-checking information with reliable, independent sources. In cases where public sources are insufficient, additional documentation may be requested.
- **Enhanced Ongoing Monitoring:** We continuously monitor business relationships on a risk-based approach to detect any suspicious activity, ensuring that all potential risks are identified and addressed promptly.

Furthermore, we ensure that domestic PEPs and individuals holding prominent roles within international organizations are also identified, and if higher risks are detected, the enhanced due diligence measures will be applied accordingly.

While all PEPs undergo stricter due diligence, a risk assessment is conducted on an individual basis to tailor the necessary controls. These measures also extend to the family members and close associates of PEPs.

Screening for PEP status is conducted during the customer onboarding process and continues throughout the business relationship. If a customer who was not initially identified as a PEP subsequently attains PEP status, enhanced due diligence will be implemented within 30 days. Failure to comply with these requirements will result in the immediate termination of the business relationship. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

4.3.1 Sanction Screening

All players are screened against relevant sanctions lists prior to the commencement of the business relationship and at defined intervals throughout, including upon any significant transaction, any change in player details and at minimum on a quarterly basis. Screening is conducted against the UN Security Council Consolidated List, the EU Consolidated Sanctions List, the OFAC List and any lists issued or recognised by the Curacao Gaming Authority or the local FIU, using a combination of automated and manual checks based on the player's full name, date of birth, nationality, and country of residence.

In the event of a potential match, the account is immediately restricted and the matter escalated to the Compliance Officer for assessment and, where required, formally reported to the FIU. Players must not be informed that they are the subject of a sanctions screening match or related investigation.

4.4 Risk Monitoring

All user activities are comprehensively documented and monitored, with high-risk actions subject to heightened and frequent scrutiny. Senior management holds weekly meetings to review reports on these high-risk activities, ensuring a thorough evaluation. This manual review process operates alongside an automated flagging system designed to identify potential irregularities, which is safeguarded by robust security controls. These controls allow for the implementation of exposure limits on players, promoting effective risk

management. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

The system specifically monitors the following high-risk areas:

- Large Transactions: Transactions exceeding NAF 4,000 (EUR 2,000) or showing similar high deposit patterns, or those deemed significant by the Company.
- High-Risk Jurisdictions: Users originating from jurisdictions with high-risk profiles, as identified by the Financial Action Task Force (FATF).
- High-Risk Payment Methods: Deposits made through payment channels that are classified as high-risk.
- Politically Exposed Persons (PEPs) and Sanctioned Individuals: Ongoing monitoring of PEPs and individuals listed on sanctions lists.
- Deviations in User Activity: Identification of deposit or wagering behaviours that significantly differ from a player's historical patterns.
- Suspicious Player Strategies: Scrutiny of unreasonable or suspicious player strategies that may indicate potential fraud or high risk.

These measures ensure a proactive approach to identifying and mitigating risks associated with money laundering and other illicit activities.

4.5 Monitoring of Transactions – Customer Risk

To ensure comprehensive oversight of transactions within the Company's operations and strengthen the monitoring protocols outlined earlier, individuals will be classified into risk categories based on their behaviour and related data.

Low Risk: Individuals will be classified as low-risk if they meet the following criteria and have not previously been assigned to another risk category:

- Transactions or deposits do not exceed €2,000.
- No alerts or suspicions are triggered by their activity.

Customers identified as low-risk will undergo standard Customer Due Diligence (CDD) procedures and must provide a valid identification document (such as a national ID or passport) for identity verification through reputable, independent sources.

Medium Risk: Individuals who meet certain criteria, which may include suspicious transaction patterns or inconsistencies, will be classified as medium risk. These individuals are characterized by:

- Deposits, payment methods, and transaction timelines contributing to their medium-risk classification.
- Alerts or flagged transactions, particularly those involving inconsistencies in geolocation or payment methods.

An automated alert is triggered when a customer exceeds €5,000 in deposits within a 30-day period. Agents may manually escalate the customer's risk level to high if additional alerts or inconsistencies are detected.

Medium-risk customers will undergo Enhanced Due Diligence (EDD) verification and continuous monitoring to ensure compliance with regulations and mitigate potential risks effectively.

High Risk: High-risk customers are identified by the following characteristics:

- Large deposit amounts, unusual payment methods, and/or irregular transaction timing.
- Association with Politically Exposed Persons (PEPs).
- Residency or citizenship in high-risk countries.
- Current suspicions related to money laundering or other illicit activities.

An automated high-risk alert is triggered when a customer exceeds €10,000 in deposits within a 30-day period or as defined by the Company.

High-risk customers will undergo thorough Enhanced Due Diligence (EDD) procedures, including continuous monitoring, to ensure full regulatory compliance and effectively mitigate identified risks.

4.6 Business Relation Obligation

The record-keeping procedures outline the types of Anti-Money Laundering (AML) data to be retained and specify the minimum retention period in compliance with the Company's Implementing Procedures. These protocols distinguish between different data sets based on risk categorizations, as detailed in additional procedures, and address the proper storage of AML-related documents on secure technical infrastructure, ensuring compliance with privacy laws. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Records identification, documentation collected for risk categorization includes:

- Player personal details from registration or later stages.
- Results of automated identity verification.
- Copies of identification documents and proof of address.
- Additional documents required based on the player's risk category, such as source of wealth verification.

Employee records include personal information, CVs, certificates of good conduct, and records of completed AML/CFT training.

Transaction Records

All transaction data should be digitally archived on the Company's infrastructure and include:

- Methods used for deposits and withdrawals.
- Source and destination of funds.
- Credit card transaction approvals.
- Transaction volumes.

AML Legislation Records

Required documentation for compliance with PMLFTR includes:

- Internal reports submitted to the Money Laundering Reporting Officer (MLRO).

- MLRO determinations, including explanations for not filing Suspicious Transaction Reports (STR) with the FIU Curacao.
- STRs submitted to the FIU and follow-up reports.
- MLRO reports to senior management, including assessments of Politically Exposed Persons (PEPs).
- Senior management's written deliberations on MLRO recommendations.
- Internal AML audits and training verification documents.

These procedures ensure the secure and compliant storage of AML data while protecting personal privacy.

All player records, documents, and identification data are subject to periodic review to ensure they remain accurate, valid, and sufficient for AML/CFT compliance purposes. Reviews are triggered by specific events including the expiry of an identification document, any change in the player's personal details, a change in risk classification, or a significant change in transactional behaviour, and must be conducted at least annually for standard risk players and more frequently for medium and high risk players. Where updated documentation is required, players will be notified and must respond within 30 days. Failure to provide satisfactory updated documents within this period will result in account restriction or permanent closure. The Compliance Officer is responsible for overseeing the document review process and maintaining a log of all reviews conducted and their outcomes.

4.7 Reporting of Transactions

In line with its internal procedures, the Company is obligated to adhere to the National Ordinance for Identification of Services and comply with the legal requirements for detecting and reporting unusual transactions, whether these transactions are completed or attempted. The casino must implement comprehensive procedures that address the following critical areas: This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Identification of Unusual Transactions: Establishing effective methods and systems to detect transactions that deviate from regular patterns or those that raise suspicion due to their nature, volume, frequency, or any other red flags.

Documentation of Unusual Transactions: Maintaining thorough and accurate records of any transactions deemed unusual. These records must be detailed and readily available for review and submission to authorities as necessary.

Reporting of Unusual Transactions: Ensuring that any identified unusual transactions are reported promptly and in compliance with applicable laws and regulations. This includes submitting the required reports to relevant authorities, such as the Financial Intelligence Unit (FIU), and following up with any required actions or documentation.

These procedures are designed to ensure that all potentially suspicious transactions are identified, documented, and reported in a timely manner, thus ensuring compliance with legal and regulatory obligations.

4.1.1 Identification of Unusual Transactions

The Company, recognise unusual transactions requires a comprehensive understanding of each player's profile and behaviour. The purpose of gathering detailed player information is to assess associated risks and create a customer profile that helps predict their actions within the business relationship.

In compliance with NORUT legislation, we have implemented both objective and subjective indicators to help management guide staff in identifying and appropriately documenting unusual transactions. All identified unusual transactions must be reported to the Compliance Officer using the format approved by management. Along with the transaction details, supporting documents such as identification copies, cash-out slips, and any other relevant materials must be submitted. The Compliance Officer is responsible for ensuring these records are properly filed and maintained. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

If any internally flagged transactions are not submitted to the Financial Intelligence Unit (FIU), the reasons for this must be thoroughly documented and signed off by the Compliance Officer and/or management. This ensures transparency and accountability in the decision-making process.

To align with FATF Recommendation 11, special attention will be given to complex, unusually large transactions or patterns that lack a clear lawful or economic purpose.

What is Considered an Unusual Transaction?

- Transactions linked to money laundering or terrorism financing that are reported to law enforcement or the Department of Justice.
- Transactions involving entities or individuals listed under the Sanctions National Ordinance (N.G. 2014 no. 55).
- Transactions of NAf. 5,000 or more, regardless of whether the payment is made electronically or via other non-physical methods. This includes, but is not limited to:
 - Cashless transactions exceeding NAf. 5,000, such as transfers from the casino's bank account to a local or international bank account at the client's request.
 - Accepting or releasing deposits of NAf. 5,000 or more at the client's request.
 - Sale of chips (or tokens/credits) for NAf. 5,000 or more to a customer.
 - Cashing out NAf. 5,000 or more.

A transaction may be considered unusual as a one-time occurrence or a series of transactions totalling NAf. 5,000 or more within a single gaming day.

- Presumed Money Laundering or Terrorist Financing Transactions: Transactions that raise suspicions of being linked to money laundering or terrorist financing activities.

By following these guidelines, the Company ensures that all unusual transactions are properly identified, documented, and reported in line with AML best practices.

4.1.2 Documentation of Unusual Transactions

We will register with the Financial Intelligence Unit (FIU) and obtain access to the goAML reporting portal once the FIU validates our registration. The goAML portal allows for bulk reporting, and the casino's account manager at the FIU should be contacted to confirm eligibility for this service.

The Compliance Officer is responsible for preparing and submitting reports of all unusual transactions to the FIU in compliance with their reporting regulations. These reports, along with any supporting documents, must be submitted in English via the goAML portal.

The casino, including its directors, officers, and employees, is legally protected from criminal and civil liability for any breach of confidentiality when providing information to the FIU in accordance with the reporting requirements.

4.1.3 Reporting of Unusual Transactions

In compliance with Article 11 of the NORUT, any unusual transactions or attempts to carry out unusual transactions must be reported to the Financial Intelligence Unit (FIU) without delay. We have established clear procedures for both internal and external reporting of such transactions, ensuring that these protocols are communicated to all relevant personnel. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Any unusual transactions, whether individual or part of a series, as specified in the Regulation Indicators for Unusual Transactions, must be immediately reported internally. Each report will be accompanied by the necessary supporting documentation.

4.8 Record Keeping

In full alignment with the National Ordinance on the Identification of Services (NOIS), the National Ordinance Reporting of Unusual Transactions (NORUT), the Sanctions National Ordinance (N.G. 2014, no. 55), and the Kingdom Sanctions Act (N.G. 2016, no. 54), the Company maintains robust record-keeping procedures that ensure the secure collection, classification, and retention of data essential for Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) compliance. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

The following categories of documentation must be preserved:

- Evidence of the application of a risk-based approach, including the Business Risk Assessment (BRA), alongside relevant policies and procedural manuals.
- All Customer Due Diligence (CDD) materials, in accordance with Section 9.2(b) of Part 1 of the Implementing Procedures.
- Full records of established business relationships and associated transactions, as specified in Section 9.2(c) of Part 1 of the Implementing Procedures.
- Internal reports submitted to the Money Laundering Reporting Officer (MLRO), including documented reasoning for any decisions not to file a Suspicious Transaction Report (STR) with the FIU.
- Copies of all STRs submitted to the FIU and any additional follow-up documentation.
- Verified documentation of AML/CFT training completed by employees.

- Employee vetting records, such as conduct certificates and screening-related documentation.
- Agreements and documentation regarding any outsourced compliance or operational functions.

All of the above data will be stored securely on the Company's servers and retained for a minimum of five (5) years from the date of the customer's last recorded transaction, marking the cessation of their active relationship with the Company.

In addition, detailed records of all AML/CFT-related reports and regulatory inquiries will be kept. These records will capture the date, nature of the inquiry, identity and authority of the requesting body, legal basis for the request, individuals or accounts involved, and any associated transactions.

Our record management framework is strictly guided by data protection laws and privacy regulations. Ongoing reviews and updates will be carried out to ensure full legal compliance with any evolving statutory requirements.

5. Employee Onboarding Screening and Training

We are dedicated to upholding the highest standards of integrity and ensuring full adherence to all applicable legal and regulatory requirements governing financial transactions. To support this commitment, the Company will establish and rigorously apply comprehensive internal policies and controls, including mandatory background checks to assess prospective employees for any criminal history. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Furthermore, we will design and implement specialized training programs for all personnel engaged in activities that involve the handling or monitoring of transactions, particularly those that may be identified as unusual under the Ministerial Decree on Indicators for Unusual Transactions (N.G. 2015 no. 73). These programs will provide clear expectations for professional conduct and reinforce the principles of Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) compliance. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Training initiatives will be role-specific, ensuring that employees receive relevant and practical knowledge tailored to their departmental functions. As a baseline, all AML/CFT training will cover the following core components:

- Legal and regulatory obligations relating to AML/CFT;
- Identification and reporting of unusual or suspicious activity;
- Use of internal reporting channels and escalation protocols;
- Data protection and confidentiality requirements; and
- Consequences of non-compliance for both the employee and the organization.

These sessions will be conducted regularly and updated in response to legislative changes or emerging risks to ensure that staff maintain a high level of awareness and capability in managing AML/CFT responsibilities.

5.1 New Joiners

All newly hired staff members who engage directly with customers or are involved in processing customer transactions regardless of their role or seniority must undergo in-depth training focused on anti-money laundering (AML), counter-terrorist financing (CTF), and the mandatory reporting of unusual activities to the designated compliance officer.

This initial training will provide a clear understanding of the legal and regulatory landscape surrounding money laundering, terrorist financing, and proliferation financing. It will familiarize employees with the organization's internal AML/CTF framework, including operational policies, procedural controls, and statutory reporting obligations.

Training will also address industry-specific risks by examining money laundering methods and emerging trends relevant to the gambling sector. A significant emphasis will be placed on effective customer due diligence (CDD) processes and how to assess risk profiles. Staff will be taught to identify and respond to both objective and subjective red flags associated with suspicious transactions, ensuring they are fully equipped to act in line with the company's compliance expectations from day one. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

5.2 AML/Compliance Team

Personnel responsible for overseeing the Anti-Money Laundering (AML) program must receive advanced, role-specific training to ensure they remain up to date with the evolving landscape of financial crime and the corresponding regulatory developments. This specialized training is critical for enhancing the organization's ability to effectively identify, assess, and mitigate emerging AML/CFT risks. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

In addition to ongoing internal knowledge development, AML officers and designated compliance staff are encouraged to participate in external professional development opportunities. These may include attending accredited seminars, industry conferences, regulatory briefings, and specialized workshops led by recognized experts in AML, counter-terrorist financing, and sanctions compliance. Such engagements provide a valuable forum for gaining deeper insights into current typologies, enforcement priorities, technological advancements (such as AI-driven monitoring tools), and international best practices. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

The training will also equip AML program leaders with the skills necessary to update internal policies, strengthen oversight mechanisms, and provide effective guidance to other departments. This proactive approach ensures the organization's AML framework remains robust, compliant, and responsive to both local and global threats.

5.3 Management

Senior Management, including both departmental Managers and members of the Board of Directors, must undergo advanced training covering all critical aspects of money laundering, terrorist financing, and the applicable internal policies, procedures, and regulatory obligations. This training is essential to ensure that leadership is equipped with the knowledge needed to oversee and support a compliant and effective AML/CFT framework. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Furthermore, ongoing communication regarding money laundering risks and emerging threats must be maintained at the executive level. Regular updates and risk assessments should be presented to the Board to keep them informed of any developments that may impact the organization's integrity and reputation. This ensures that strategic decisions are made with a clear understanding of the potential legal, financial, and reputational consequences related to financial crime exposure. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

5.4 Training Program

Ongoing refresher training must be conducted at regular intervals to ensure that employees remain well-informed about emerging risks, evolving money laundering and terrorist financing techniques, and any changes to regulatory expectations. This continuous learning approach helps staff maintain the necessary competence to identify and respond to suspicious activity effectively.

To verify compliance with these training obligations, the casino is required to keep detailed records of all training activities. These records should include the full content of the training sessions, a list of participants, training dates, results of any knowledge assessments or evaluations conducted, and a structured plan outlining future training initiatives. This documentation supports regulatory transparency and reinforces the company's commitment to sustained AML/CFT awareness and performance. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

6. Business Risk Assessment (BRA)

In strict adherence to its obligations as a subject person under Curacao's Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) regulations, the Company has undertaken a comprehensive AML/CFT Business Risk Assessment (BRA) to identify, assess, and manage the risks associated with its activities and service offerings.

Aligned with its overarching risk management framework, the Company has adopted and maintains a Medium Risk Appetite, balancing its commitment to business growth with the need to proactively address and minimize exposure to ML/FT threats.

6.1 Risk Assessment

Risk is defined as the possibility of an adverse event occurring, or the failure to achieve a desired outcome, which negatively impacts business operations, reputation, or financial stability. Risks become evident in a variety of situations, including:

- Failure to meet established business objectives and performance targets.
- Non-compliance with internal organizational policies, external regulations, or relevant legislation.
- Inefficient, ineffective, or inappropriate use of business resources or assets.

To proactively manage these risks, the Company must implement a comprehensive and effective risk assessment and management framework. This framework should be designed not only to prevent potential threats from arising but also to ensure that contingency plans are in place to mitigate the impact of risks if they do materialize. This enhances Sculpture N.V.'s capacity to align its internal controls with Curacao regulatory benchmarks.

The risk management process should be robust, standardized, and well-documented, providing clear guidelines for conducting assessments. This ensures that assessments produce consistent, valid, and comparable results, regardless of who conducts them or when they are carried out.

In line with industry standards, the Company adheres to risk assessments performed by the Curacao regulatory authorities, as well as relevant supranational risk assessments for the gaming sector. These assessments consistently highlight the gaming industry as a high-risk environment due to its susceptibility to various forms of financial crime, including money laundering and terrorist financing. The Company also aligns its operations with the Curacao Framework, ensuring that its risk management processes are in line with national and international best practices. This enhances Sculpture N.V.'s capacity to align its internal controls with Curacao regulatory benchmarks.

6.2 Criteria Risk Assessment

There are various situations in which conducting an Anti-Money Laundering and Financing of Terrorism (AML/CFT) risk assessment becomes essential for the Company. These situations typically include:

- Performing a comprehensive risk assessment that evaluates a wide range of factors, including the diverse customer types the Company serves, the range of services it provides, the communication channels used to interact with customers, and the geographical regions in which the Company operates. This ensures a holistic understanding of the associated risks. This enhances Sculpture N.V.'s capacity to align its internal controls with Curacao regulatory benchmarks.
- Integrating periodic updates to the AML/CFT risk assessment into the Company's regular management review process. This ongoing review helps to adapt to changing internal and external conditions, ensuring the Company remains vigilant to emerging risks.

- Evaluating internal projects or strategic initiatives that are expected to introduce significant changes to the Company's business model. These changes may involve new services, markets, or technological innovations, each of which could introduce new risks that require thorough assessment.
- Undertaking a reassessment of the existing risk landscape when substantial external events or changes occur that could render prior risk assessments outdated or incomplete. Such events include alterations to applicable laws, regulations, or other significant shifts in the external environment that could affect the Company's risk exposure.

In cases where there is any doubt or ambiguity regarding whether a risk assessment is needed, the Company should adopt a precautionary approach and proceed with conducting an assessment. This ensures that potential risks are proactively identified and addressed, minimizing the possibility of compliance gaps.

6.3 Process – Risk Assessment

The risk assessment process follows a structured series of steps as outlined below:

- **Asset Identification:** This step involves recognizing the critical assets at risk related to Anti-Money Laundering and Financing of Terrorism (AML/CFT). The primary focus is on protecting assets such as the Company's reputation and its compliance standing. Failure to safeguard these assets could lead to severe consequences, including the suspension of operational licenses, financial penalties, or potential legal action against individuals responsible for AML breaches. This enhances Sculpture N.V.'s capacity to align its internal controls with Curacao regulatory benchmarks.
- **Risk Area Identification:** This step is concerned with identifying the various risk areas across the organization. It encompasses customer types, services provided, communication channels used, geographical locations of operation, as well as both internal and external operational risks, particularly those related to employees who manage customer relationships.
- **Threat Identification:** This involves evaluating threats specific to each identified risk area, taking into account known occurrences and vulnerabilities within the Remote Gaming Industry. Understanding these threats allows the Company to anticipate and prepare for potential risks.
- **Vulnerability Assessment:** Here, the Company assesses vulnerabilities that arise from factors such as limited face-to-face interactions with customers, the use of diverse payment methods, and the potential inadequacies in AML/CFT frameworks in certain jurisdictions. These vulnerabilities are critical to understanding areas where the Company is more susceptible to risk.
- **Risk Scenario Identification:** This step identifies specific risks to compliance and business operations through collaborative discussions and interviews with relevant stakeholders. The findings are documented in a Risk Matrix, which includes

feedback from the Director of the Company (Sculpture N.V.), the Compliance Officer, and employees engaged in customer relations and payment processing.

- **Probability Assessment:** In this step, the likelihood of identified threats materializing is estimated based on historical data, trends within similar organizations, and the presence of sufficient motive, opportunity, and capability for the threat to manifest. This assessment is vital to gauge the likelihood of a risk occurring in the future.
- **Impact Assessment:** Finally, the Company evaluates the potential consequences of Money Laundering and Financing of Terrorism incidents. This includes assessing the legal, compliance, and operational impacts on the Company, as well as the broader implications for individuals and countries potentially vulnerable to terrorist activities.

This structured process ensures that all aspects of AML/CFT risk are thoroughly assessed, with an emphasis on proactive identification, evaluation, and mitigation of risks.

6.4 Evaluation and Analysis of Risks

To assess risks to assets and develop appropriate mitigation strategies, the Company has conducted a comprehensive analysis covering potential threats, vulnerabilities, the likelihood of occurrences, and the possible impact of such events. A 5-point scale is employed to quantify both the probability of risk and its corresponding impact.

The likelihood scale ranges from 1 (improbable) to 5 (almost certain), while the impact scale spans from 1 (negligible) to 5 (very high). This organized method enables effective risk prioritization, aiding in the development of more targeted management strategies. The risk matrix shown below visually displays these scales and supports the prioritization of risks. This enhances Sculpture N.V.'s capacity to align its internal controls with Curacao regulatory benchmarks.

The classification of each risk is based on the score derived from multiplying the likelihood and impact ratings. With both scales ranging from 1 to 5, the final scores range from a minimum of 1 to a maximum of 25, as shown in the matrix. Risks are categorized as follows:

- **High:** Scores of 12 or higher
- **Medium:** Scores between 5 and 10
- **Low:** Scores from 1 to 4

The reasoning behind the assigned likelihood and impact ratings is documented to ensure that any significant changes can be assessed over time. If any material changes occur, the risk matrix will be updated, maintaining consistency in the evaluation of risks.

6.5 Effectiveness

The table below demonstrates the performance of the applied controls, offering a clear view of their strength in mitigating identified threats. This evaluation supports the analysis of the remaining (residual) risk level after all risk-reduction measures have been executed.

Mitigation Level	Description
4 – Strong	Controls are thorough, consistently implemented, and demonstrably effective in mitigating relevant risks. No immediate enhancements are needed.
3 – Satisfactory	Controls are generally effective and applied with reasonable consistency. Risks are adequately managed, though further improvements could enhance performance.
2 – Limited/Weak	Controls are in place but applied inconsistently or only partially address the risks. Substantial improvements are needed to ensure effective risk management.
1 – Absent/Deficient	Controls are either non-existent or ineffective in mitigating the risks. Immediate action is required to establish adequate controls.

The diagram provides a structured representation of the methodology used to determine the Residual Risk outcome. This process involves evaluating the level of inherent risk, defined as the exposure to risk in the absence of any controls and assessing the effectiveness of the existing mitigation measures. By cross-referencing these two variables in a matrix, the residual risk level is calculated. This outcome reflects the degree of risk that remains after all mitigating controls have been applied, and serves as a key indicator for decision-making in risk management strategies.

6.6 Risk Identification, Analyses and Evaluation

The following table presents an overview of the key business risk factors related to money laundering and terrorist financing (ML/FT), including the primary threats identified and the corresponding mitigation measures established.

A comprehensive breakdown of the risk identification and analysis process along with an evaluation of the effectiveness of the controls, internal policies, procedures, and other risk mitigation strategies currently in place at Sculpture N.V. can be found in Annex 1 of this document "Risk Assessment Matrix ".

Risk Factor	Risks Identified	Mitigation Measures Implemented	Residual Risk
Interface	Limited in-person interaction increases the likelihood of customer anonymity and identity fraud.	Digital onboarding processes include Customer Due Diligence (CDD) at account creation and upon reaching defined transaction thresholds, supported by enhanced monitoring of behavioural patterns and suspicious activity.	Medium
Customer	- Diverse customer types including PEPs, VIPs, and high-risk individuals.	- Standard and Enhanced Due Diligence (SDD/EDD) based on customer risk classification. - Targeted screening of VIPs and	Low

	- Risk of fraudulent or multiple account registrations.	- PEPs via trusted databases. - Continuous monitoring.	
Product	- Abuse of specific products or payment features (e.g., prepaid cards, rapid withdrawals). - Exploitation via repetitive behavioural patterns.	- Real-time monitoring of transactions for anomalies. - Implementation of strict controls on deposits and withdrawals. - Reporting of suspicious transactions as required.	High
Geographical	- Use of services from jurisdictions classified as high-risk by FATF or similar bodies. - Payments linked to high-risk territories.	- Ongoing geographical risk analysis aligned with FATF updates. - Application of SDD, CDD, and EDD based on location risk. - Regular review of jurisdictional risk indicators.	Medium
Employee Risk	- Unintentional or intentional facilitation of ML/FT due to lack of awareness or inadequate control. - Improper assignment of AML responsibilities.	- Comprehensive pre-employment screening. - Mandatory and recurring AML/CTF training. - Regular internal audits and supervision of AML compliance roles.	Medium
Outsourcing	AML functions are handled internally only, with outsourcing restricted or prohibited as per policy.	All AML responsibilities are carried out in-house under strict internal oversight, ensuring control and accountability.	N/A

6.7 AML/CFT Risk Management Process

The overall medium risk rating assigned to all identified risk factors is deemed reliable only if Sculpture N.V. constantly and effectively enforces its Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT), Fraud Prevention, Business, and Customer Risk Management Policies and Procedures. The ongoing success of this risk level classification is also contingent upon the company's continuous monitoring and scrutiny of customer activity across all operational channels. This enhances Sculpture N.V.'s capacity to align its internal controls with Curacao regulatory benchmarks.

As part of this assessment, the company's relevant internal policies and procedures have been thoroughly reviewed and updated to reflect the current AML/CFT Risk landscape. These updates are essential to ensure that the control framework remains effective and proportionate to the level of risk identified.

The company is committed to conducting periodic reviews and timely updates of these procedures, with the objective of maintaining full alignment with applicable legal and regulatory obligations. Moreover, regular evaluations of the adequacy and efficiency of implemented risk mitigation measures will be performed to ensure that the residual risk remains within acceptable limits, as defined by the company's stated risk appetite. This enhances Sculpture N.V.'s capacity to align its internal controls with Curacao regulatory benchmarks.

This AML/CFT Risk Assessment shall be reviewed and updated at least once every 12 months. However, it must also be re-evaluated sooner if there are any significant changes in the company's operational structure, customer base, product offering, risk exposure, or applicable laws and regulations.

Until the next scheduled review date, the company must maintain heightened awareness of any developments that could impact its risk profile. Any such changes may trigger an early reassessment of this document to ensure continued relevance and regulatory compliance.

Current Risk Evaluation Summary:

- Inherent Risk Level: Medium
- Residual Risk Level: Medium

7. Customer Risk Assessment (CRA)

The Company conducts a manual risk evaluation as part of the Customer Due Diligence (CDD) process whenever a customer's activity reaches a threshold of NAF 4,000 (approximately €2,000.00) in a single deposit or over a rolling period. This evaluation is carried out in accordance with the Financial Intelligence Unit (FIU) Guidelines, which identify four key risk factors: This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

- Customer Risk
- Product, Service, and Transaction Risk
- Distribution Channels Risk
- Geographical Risk

By analysing these factors, the Company seeks to thoroughly assess the potential risk presented by each customer. This enables the Company to make informed decisions and apply appropriate risk mitigation measures, ensuring compliance with regulatory requirements.

7.1 Process and Approach

The Company conducts a detailed manual customer risk assessment based on the information collected during the customer registration process. This assessment is initiated once a customer reaches the deposit threshold of NAF 4,000 (approximately €2,000.00). At this stage, a risk rating is assigned to the customer, categorizing them as low, medium, or high risk. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

Depending on the assigned risk level, the Company applies different levels of due diligence:

- Low-Risk Customers: Standard Customer Due Diligence (CDD) procedures are followed, which include verifying basic customer information.
- Medium-Risk Customers: In addition to the standard CDD, the Company collects further details such as occupation, source of funding and wealth, place of birth, and nationality.
- High-Risk Customers: Enhanced Due Diligence (EDD) procedures are required, involving a thorough verification of all relevant documentation and a more extensive review of the customer's background.

This risk assessment determines the depth and frequency of the CDD process and ongoing monitoring required for each customer. It takes into account factors such as the customer's economic activities and/or sources of wealth (SOW).

The Customer Risk Assessment (CRA) is carried out within 30 days after the customer reaches the deposit threshold of NAF 4,000 (€2,000) within a rolling 180-day period. The outcome is a Customer Risk Profile, which is reviewed continuously throughout the course of the business relationship, especially as new information becomes available. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

The customer relationship is considered to begin when the customer opens an online account through the Company's website. Moreover, the Company reserves the right to reassess the customer's risk level at any point during the business relationship, particularly if there are significant changes in the customer's behavior or financial activity. The customer's risk profile is reviewed at least semi-annually, or more often if certain trigger events occur, such as a substantial increase in spending or reluctance to provide the necessary documentation for CDD. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

If the customer fails to provide the required documentation within 30 days of the request, the Company may suspend or even close the account, as stipulated by its internal procedures and regulatory obligations.

7.2 Risk Scoring

The Company defines the allocation of risk percentages across various categories as part of its comprehensive, risk-based approach. These allocations reflect the relative importance of each risk area in determining the overall risk associated with a customer. The risk categories and their corresponding allocations are as follows:

Customer Risk (30%): This category evaluates the individual characteristics of the customer, including their financial background, occupation, and potential exposure to high-risk activities. A higher weight is assigned to customers whose profiles present elevated concerns regarding illicit activities or financial crime.

Product, Transaction, and Service Risk (40%): This category focuses on the risk associated with the products, services, and transactions that the customer engages with. Higher percentages are allocated to high-risk products or services, such as those involving large or complex financial transactions, or gambling activities, which may present increased money laundering risks. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

Delivery Channel Risk (10%): This assesses the risk posed by the method through which services are delivered, including online channels or physical locations. Digital platforms or other remote services may carry higher risks due to their susceptibility to anonymous transactions or lack of face-to-face interaction.

Geographical Risk (20%): This category evaluates the risk related to the customer's location and the jurisdictions they are connected to. Regions known for weak anti-money laundering controls or high levels of corruption may contribute to a higher risk assessment.

If a customer is identified as a Politically Exposed Person (PEP), their risk score is automatically increased to 100%, categorizing them as high risk. This is due to the increased potential for exposure to corruption or illicit financial activity often associated with such individuals. In line with the Company's Anti-Money Laundering (AML) Fraud Management policy, the Company reserves the discretion to either accept or decline the registration of PEPs based on an in-depth evaluation of the associated risks. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

Both the business risk assessment and the customer-specific risk assessment focus on the same four core risk areas outlined above. These areas form the foundation for determining the appropriate level of due diligence required for each customer and are central to the Company's efforts to ensure compliance with AML regulations and mitigate the risk of financial crime. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

7.2.1 Customer Risk

For the Company, a customer refers to a natural person who is either seeking to initiate or has already established a business relationship with the organization. The level of risk associated with each customer can vary significantly based on their individual profile. The Company exclusively engages with natural persons as customers, and the primary focus of the risk assessment process is their economic activities and/or sources of wealth. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

The risk assessment process involves evaluating the consistency, reliability, and completeness of the information available about the customer. Verification of client identification is carried out using methods outlined in the Company's Anti-Money Laundering (AML) procedures, which are also applied during the initial assessment of the customer's risk profile.

Through this process, the Company identifies specific categories of clients or business relationships that present elevated risks. These clients are subject to increased monitoring and additional precautionary measures. Transactions involving individuals from jurisdictions that do not fully comply with international AML standards are given particular scrutiny.

In cases where transactions appear to lack reasonable economic justification or seem to lack a legitimate purpose, the Company proactively gathers supplementary information regarding the nature and objectives of the transaction.

Clients who currently or have previously held senior state positions, as well as those closely associated with them, are subject to a significantly higher level of scrutiny.

The risk assessment of a natural person is primarily based on their economic activities and/or sources of wealth. A customer with a steady, singular source of income is considered to present a lower risk for money laundering (ML) or terrorist financing (TF) compared to those with multiple or irregular income streams. This is due to the added complexities involved in verifying multiple income sources and ensuring that the amounts deposited and wagered align with the customer's declared sources of income during ongoing monitoring. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

Heightened due diligence measures may include requesting additional documentation, conducting online research, obtaining references from counterparties, verifying income sources with employers, following directives from the Financial Intelligence Directorate, or implementing other appropriate measures as needed.

Certain business or professional activities from which a customer or beneficial owner derives wealth or funds carry a higher risk of ML and TF. These include activities involving large cash transactions, industries susceptible to corruption or financial crime (such as the firearms trade, defense sector, and mining industry), virtual currencies, and charitable

organizations that facilitate fund transfers to high-risk jurisdictions. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

On the other hand, activities deemed to present a lower risk of ML and TF include entities listed on regulated markets subject to strict disclosure requirements, businesses operating under effective financial supervision, and entities within the public administration.

Beyond business activities, other risk factors include individuals seeking residence rights or citizenship through capital investments, or individuals associated with Politically Exposed Persons (PEPs) or those holding prominent public positions that may be susceptible to misuse for personal gain.

7.2.2 Product and Transaction Risk

Certain products, services, and transactions naturally present higher risks and are more susceptible to exploitation by criminals. These include activities that allow customers to influence game outcomes, particularly through coordinated efforts. High-risk factors also involve specific funding methods like cash or anonymous payment options, such as prepaid cards or virtual currencies, which obscure audit trails and provide anonymity. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

An especially high-risk factor involves the use of accounts or cards under third-party names to mask the true identity of the account holder. On the other hand, when customers transfer funds from bank accounts or cards registered in their name with reputable institutions in compliant jurisdictions, the risk of Money Laundering (ML) is lower. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

The level of risk associated with a product, service, or transaction is influenced by factors like transparency, complexity, and value. Products or services that offer anonymity, such as nominee accounts, are considered higher risk. Transactions that are complex, particularly those crossing international borders with multiple entities and jurisdictions, increase the level of risk. Additionally, products or services that involve cash transactions are seen as riskier compared to those with clear and traceable funding sources. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

In summary, inherent risks are tied to the nature of the product, service, or transaction, particularly when factors like transparency, complexity, and cash usage are involved. Activities that enable high-value transactions or offer payment instruments with no limits or caps represent a higher risk compared to those with established restrictions. These limits should also be considered when assessing the level of risk. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

7.2.3 Delivery Channel Risk

The Company's risk exposure in its business relationships and transactions is heavily influenced by the channels used for customer interaction and transaction execution. Channels offering anonymity inherently increase the risk of Money Laundering and Terrorism Financing (ML/TF) unless effective safeguards are in place. To counteract risks like identity fraud or impersonation, the Company applies technological solutions and additional risk-based measures. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

Electronic databases help confirm that identification details match real individuals but are insufficient alone to verify true customer identity, requiring further verification steps. The risk also rises when third parties are involved, especially if they are not subject to AML/CFT obligations. Introducers like affiliates generally present a lower risk compared to third-party-operated physical establishments, where oversight of deposited funds is more challenging. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

Overall, the risk level depends on how products and services are delivered. While non-face-to-face interactions are not automatically high risk, without proper technological controls, such scenarios can significantly elevate ML/TF risks. The Company carefully evaluates intermediaries' reliability and compliance standards when customers are introduced through third parties or internal networks.

7.2.4 Geographical Risk

The Company actively monitors and reviews reports and updates from authoritative sources such as the FATF (Financial Action Task Force) sanction lists, United Nations sanctions lists, and other country-specific evaluations to maintain an up-to-date understanding of geographical risk factors. Continuous awareness of these resources ensures that country risk assessments remain aligned with the latest global standards and threats. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

In evaluating geographical risk, the Company considers several customer attributes, including nationality, country of residence, and place of birth. These factors are carefully analyzed, as they may indicate a heightened exposure to Money Laundering (ML) or Financing of Terrorism (FT) risks.

Customers who are linked to countries with known deficiencies in AML/CFT frameworks, countries listed on international sanctions lists, jurisdictions associated with high levels of corruption, or those sanctioned for terrorism financing or arms proliferation, are automatically classified as high-risk. On the other hand, customers associated with jurisdictions identified as having low or moderate ML/FT risk are categorized accordingly, subject to standard or simplified due diligence measures. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

To determine geographical risk more comprehensively, the Company assesses multiple criteria, including:

- Jurisdictions identified by FATF, MONEYVAL, the International Monetary Fund (IMF), or other reputable sources as having serious shortcomings in their AML/CFT systems.
- Countries subject to international sanctions or restrictive measures by the UN, EU, or similar bodies.
- Nations known to support terrorist activities or organizations directly or indirectly.
- Countries exhibiting high levels of public sector corruption or weak governance standards.
- Jurisdictions lacking transparency regarding beneficial ownership, failing to meet international tax cooperation standards, or offering secrecy that can obscure the origin and ownership of funds.

This detailed analysis allows the Company to tailor its due diligence processes to the specific risks associated with each customer's geographical connections, applying enhanced measures where necessary to mitigate exposure to ML/FT threats.

7.3 Process for Due Diligence

Upon receipt of a customer's first deposit which formally establishes a business relationship the Company promptly initiates its Customer Due Diligence (CDD) procedures. This process begins even before the deposit is accepted, with an initial verification of the customer's identity and a cross-check to confirm there are no duplicate accounts registered under the same name, effectively minimizing the risk of multiple account holdings by a single customer. Customers are also required, at this stage, to disclose any status as Politically Exposed Persons (PEPs). This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

Following the initial deposit, the customer's details are automatically screened against updated PEP and Financial Sanctions lists to identify any potential high-risk indicators. A thorough evaluation of the customer's risk profile is then conducted, considering all previously gathered information and relevant risk factors. Ongoing monitoring is assigned based on the customer's risk classification (low, medium, or high). This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

All CDD activities from identity verification to ongoing risk assessments are carefully documented and securely retained for as long as the business relationship remains active. Additionally, these records are preserved for at least five years after the relationship ends, in full compliance with regulatory obligations, or longer if necessary following the filing of a Suspicious Transaction Report (STR). This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

Customer Due Diligence is systematically triggered in specific cases:

- When cumulative deposits linked to a customer reach NAF 4,000 (€2,000) over a rolling period.
- When preliminary screening flags a customer as potentially high-risk.
- When additional nationality or place of birth information is required.

Identity and address verification are performed through trusted verification service providers, cross-referencing customer data with reputable databases to ensure authenticity.

The documentation required for verification includes:

- A valid, unexpired government-issued photo ID (passport, national ID card, residence permit, or driving license).
- Proof of residential address, such as a recent bank statement, utility bill, official police certificate, or government-issued correspondence indicating the declared address.
- Proof of source of funds, including recent bank statements, images or scans of payment cards, or records from licensed E-wallet providers showing clear ownership of the funding method.
- A source of wealth declaration, which may be supported by employment contracts, salary slips, or relevant financial statements illustrating the origin of the customer's assets.

Through these enhanced, structured measures, the Company ensures a strong foundation for regulatory compliance, effective risk management, and the maintenance of a secure operational environment.

7.4 Enhanced Due Diligence

If a customer is classified as high-risk, the Company is required to implement a series of Enhanced Due Diligence (EDD) measures to rigorously verify the customer's identity, assess the legitimacy of their financial background, and mitigate potential risks:

Additional, more stringent identity verification steps must be carried out. These include:

- Acquiring a certified copy of the customer's identification document, authenticated by a reputable professional (such as a notary, lawyer, or accountant), whose professional status can be independently verified.
- Conducting an independent cross-check of the customer's identity details against a second reliable electronic verification source to confirm consistency and authenticity.

7.4.1 Source of Wealth (SOW) Verification

The Company must thoroughly validate the origin of the customer's wealth, demanding verifiable evidence rather than relying solely on self-declarations. Acceptable forms of evidence include:

- **Employment or Business Income:** Recent payslips, employer-issued confirmation letters, or up-to-date audited financial statements for business owners.
- **Real Estate Transactions:** Executed copies of property sale contracts or official land registry extracts.
- **Inheritance:** Legal copies of wills, probate documents, or inheritance settlement statements detailing the value and distribution.
- **Corporate Sales:** Sale agreements, financial documentation from certified accountants, or formal declarations from legal representatives confirming the proceeds of business sales.

7.4.2 Source of Funds (SOF) Verification

The precise origin of the customer's funds must be verified to ensure they are not sourced from unlawful activities. Deposits should originate from payment instruments issued by financial institutions licensed within the European Economic Area (EEA) or similarly regulated jurisdictions.

7.4.3 Communication with PSPs (Payment Service Providers)

Where possible, the Company should establish direct communication with the financial institution or payment service provider responsible for the customer's deposit method to obtain additional assurances regarding the customer's reliability and transactional integrity.

7.4.4 Enhanced Due Diligence for Politically Exposed Persons (PEPs)

In cases where the customer is identified as a PEP, a thorough reputational review must be conducted. This includes evaluating any adverse media coverage, public records, and other relevant information to determine how the PEP's status may impact the risk exposure of the ongoing business relationship.

Through the careful application of these additional procedures, the Company strengthens its controls to prevent exposure to Money Laundering (ML) and Financing of Terrorism (FT) risks associated with high-risk customers.

7.5 5. Sanctions

Customers are granted a period of thirty (30) days to fully satisfy the Company's Customer Due Diligence (CDD) or Enhanced Due Diligence (EDD) requirements. During this window, based on the customer's risk profile and pending verification status, temporary restrictions may be imposed on the customer's account. Such restrictions can include limiting access to certain deposit or withdrawal methods, capping transaction amounts, or restricting the use of deposited funds for gameplay or other services until the verification is completed. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

If, at the end of the thirty (30) day period, the customer has not provided the necessary documentation or information to the satisfaction of the Company, the customer will be deemed to have failed the due diligence process. In these cases, the Company reserves the

right to immediately suspend or permanently close the customer's account in accordance with its regulatory obligations. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

Should the customer be assessed during this period as posing a potential high risk of Money Laundering (ML) or Financing of Terrorism (FT), the Company will escalate the matter internally and may file a Suspicious Transaction Report (STR) in accordance with its established Internal Suspicious Transaction Reporting Procedure. All subsequent business activities and transactions with the customer will be frozen unless specific clearance or further guidance is received from the relevant Financial Intelligence Unit (FIU) following the STR submission. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

Where a customer has failed to meet CDD/EDD obligations within the prescribed timeframe but has not been flagged as a potential high ML/FT risk, the Company will proceed to close the account as a precautionary measure. Any funds remaining in the account at the time of closure will be returned to the customer, whenever possible, using the same deposit method originally utilized. Where the original payment method is no longer available or practical, additional verification may be required to process the refund securely. This measure strengthens Sculpture N.V.'s oversight of remote gaming compliance under Curacao regulations.

In all cases, the Company ensures that actions taken following the expiry of the 30-day period are meticulously recorded, along with the rationale behind the account closure or reporting decisions, in line with its internal recordkeeping policies and applicable legal obligations.

8. Breach of Compliance

Failure to comply with Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) obligations may result in serious legal, regulatory, financial, and reputational consequences for both the Company and its employees. These consequences are not limited to deliberate breaches but also extend to failures resulting from negligence, oversight, or inadequate internal controls.

Regulatory Sanctions: Non-compliance may lead to enforcement actions by the Financial Intelligence Unit (FIU) or other regulatory authorities. This can include:

- Administrative fines and penalties.
- Suspension or revocation of the Company's operating license.
- Mandatory audits or corrective measures imposed by regulators.

Criminal and Civil Liability: Both the Company and individual employees which including directors, officers, and agents may face criminal prosecution or civil litigation in cases involving:

- Wilful neglect or concealment of suspicious activities.
- Failure to report unusual or suspicious transactions.
- Knowingly facilitating money laundering or terrorist financing.

Employment Consequences: Employees found to be non-compliant with AML obligations, whether through intentional misconduct or failure to follow established procedures, may be subject to disciplinary action. This may include:

- Formal warnings.
- Suspension.
- Termination of employment.
- Referral to law enforcement or regulatory bodies if criminal activity is suspected.

9. Payout Management

The Company will only accept and process payments through accounts maintained with licensed financial institutions or authorized payment service providers (PSPs) that are fully approved and not restricted by the relevant Authority. Engagements with any PSPs will commence strictly after the official reactivation of the Company's license has been granted by the Authority. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

All player deposits and licensee-held funds will be accurately credited to the respective player accounts, ensuring complete traceability and separation of funds. The Company will not permit or facilitate any transactions involving cash deposits or cash withdrawals directly between players and the Company under any circumstances, thereby reinforcing transparency and AML/CFT safeguards. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

To manage dormant player balances, the Company may establish an inactive account policy. This procedure will be designed to identify accounts that have remained unused over a defined period. Dormant players may be subject to a monthly inactivity fee, which will only be applied following a minimum 30-day advance notice to the account holder. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

The implementation and structure of this process will be determined by senior management, in line with player protection standards as outlined in the Authority's Player Protection Directive and any other applicable legislation. The inactive account procedure will be monitored regularly to ensure it remains fair, transparent, and compliant with regulatory expectations. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

9.1 Deposit Process

The Company follows a structured deposit process to ensure security and transparency. Players must first register through the app and complete all required Know Your Customer (KYC) checks to verify their identity. Once registered, they access the Deposits page, where a variety of popular, country-specific deposit methods are offered, typically including credit cards, debit cards, and eWallets approved by the Financial Services Authority (FSA). This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

After selecting a deposit method and amount, players are redirected to a certified Payment Service Provider (PSP) for processing. Upon transaction submission, the Company awaits confirmation from the card acquirer or eWallet provider. Once approved, the transaction details are recorded in the player's account and stored in the database for accuracy and future access. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

The Company employs strict fund protection measures, ensuring all player balances are fully backed by designated bank accounts and PSP wallets. At least 90% of player funds must be held in segregated accounts as per regulatory obligations, guaranteeing player balances are always covered.

To strengthen oversight, the Board regularly reviews reports on the segregation of player funds versus system-recorded balances. Daily reconciliations are conducted between Protected Player Fund accounts and system balances, and if discrepancies are found, additional funds are promptly transferred to maintain full compliance and player confidence.

9.2 Withdrawal Process

To withdraw funds, players must select an approved payout method through the Accounts page on the website. The available balance eligible for withdrawal is displayed, and players choose the withdrawal amount and method. Withdrawals must be returned via the same deposit method (e.g., credit card or eWallet) used for the original deposit, where applicable. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

The Company then conducts a thorough verification process, including checking KYC documentation, validating identity, reviewing for duplicate accounts, and requesting additional documentation if needed. Once the withdrawal is approved, it is forwarded to the Payment Service Provider (PSP) for processing. The PSP confirms the transaction outcome, and the player's balance is updated accordingly. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

The website is then updated to reflect the player's revised account balance in real-time.

9.3 Handling of Funds

All valid wagers must be made using funds securely held in a player's wallet, ensuring funds are available via successful transfers or confirmation from the card issuer or original funding source. These funds can be used for wagers or withdrawn back to their original account, but cannot be transferred between user accounts. This adjustment strengthens Sculpture N.V.'s risk-based approach under Curacao regulations.

Players have access to detailed records of all fund movements, including inbound and outbound transactions and funds used for wagers. These details are visible in the player's wagering summary and wallet page, showing the balance before and after each transaction.

Wager outcome regulations, including those for non-winning wagers, are transparently displayed on the site. The system is designed to prevent loss of data or funds during service interruptions, although temporary issues may prevent placing wagers. The platform is built with High Availability (HA) to minimize the impact of such disruptions.

10. Independent Audit

Sculpture N.V. shall undergo an annual independent audit of its AML/CFT program and internal controls. The audit plan includes an evaluation of the effectiveness of the Risk Assessment Matrix, transaction monitoring systems, and staff training programs to ensure full compliance with Curacao regulatory standards.

11. Policy Review and Compliance

This AML/CFT policy shall be reviewed periodically to ensure its continued effectiveness and relevance. At a minimum, a comprehensive review will be conducted once a year or sooner if significant operational or regulatory changes occur.

12. Contact Information

For any questions regarding this policy please contact:

Licensee Name: Sculpture N.V.

Address: Zuikertuintjeweg Z/N (Zuikertuin Tower), Curacao.

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