

AML POLICY OF POWER.WIN

Last updated: 16 April 2026

Introduction

Power.win is a brand name of Super Awesome Gaming Alliance B.V. (“SAGA”). Power.win is operated by Super Awesome Gaming Alliance B.V., with its office registered in Zuikertuintjeweg Z/N, Curaçao. References in this policy to “the Company”, “We”, “Us” or “Our” mean Super Awesome Gaming Alliance B.V.

Objective of the AML Policy

We seek to offer a high level of security to all of our users and customers on Power.win. To support this, we apply a risk-based, multi-step account verification process to help ensure the identity of our customers. The purpose is to confirm that the details of the person registered are correct and that deposit and withdrawal methods are not stolen or being used by someone else, forming part of our framework to combat money laundering and related financial crime.

We recognize that depending on a user’s nationality and country of residence, payment method and withdrawal method, and activity patterns, different safety measures may be required. Power.win puts reasonable measures in place to control and limit money laundering (“ML”) risk, including dedicating the appropriate resources and tools.

Power.win is committed to high standards of anti-money laundering (“AML”) according to applicable Curaçao requirements and relevant international guidelines and best practices, and requires management and employees to enforce these standards in preventing the use of its services for money laundering purposes.

Definition of Money Laundering

Money laundering includes, but is not limited to:

- The conversion or transfer of property, especially money, knowing that such property is derived from criminal activity or from taking part in such activity, for the purpose of concealing or disguising the illegal origin of the property or of helping any person involved to evade legal consequences;
- The concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of property, knowing that such property is derived from criminal activity or participation in such activity;
- The acquisition, possession, or use of property, knowing at the time of receipt that such property was derived from criminal activity or from assisting in such an activity;

- Participation in, association to commit, attempts to commit, and aiding, abetting, facilitating, and counseling the commission of any of the actions referred to above.

Money laundering shall be regarded as such even when the activities which generated the property to be laundered were carried out in another jurisdiction.

Organization of AML at Power.win

In accordance with applicable AML requirements, the board of directors of Super Awesome Gaming Alliance B.V. is responsible for the prevention of money laundering on Power.win. Day-to-day implementation may be delegated to designated compliance personnel and/or qualified third-party providers, under management oversight.

Where the Company relies on third parties to perform elements of Customer Due Diligence (“CDD”), such reliance is subject to appropriate safeguards. These include ensuring that the third party is regulated, reputable, and compliant with applicable AML/CFT obligations, and that all necessary customer identification and verification data can be obtained without delay upon request. The Company remains ultimately responsible for the proper execution of CDD obligations and ensures that contractual arrangements are in place governing such reliance.

AML Policy Changes and Implementation Requirements

Each major change to this AML policy is subject to approval by the managing director of Super Awesome Gaming Alliance B.V. Updated versions will be published on Power.win where appropriate.

Know Your Customer and Transaction Monitoring

Power.win applies appropriate user due diligence and ongoing monitoring measures required by law. We endeavor to prevent users from engaging in illicit or otherwise unauthorized activity. Power.win uses a combination of internal controls and third-party services to support compliance with applicable requirements.

Know Your Customer

Customer Due Diligence (“CDD”)

Power.win has adopted a risk-based CDD approach to understand the nature and purpose of a user’s relationship with the platform and to develop a customer risk profile. We collect documentary and non-documentary information at account opening and throughout the customer relationship where warranted.

This may include:

- Collecting baseline information (e.g., email address, wallet address where applicable) at account creation through Power.win's onboarding process;
- Monitoring risk indicators associated with funding sources (including, where applicable, cryptocurrency wallet risk signals);
- Maintaining records of the information used to identify the user;
- Determining whether a user appears on relevant sanctions, watch, or restricted party lists based on the information collected.

The above steps may be operationalized using the following measures:

Identity and Age Verification: A third-party verification provider may support our ability to assess the legitimacy of identification materials and confirm that a user is permitted to use the platform. As part of onboarding and ongoing checks, we may also screen against sanctions lists and assess location and jurisdictional eligibility based on available information.

Customer Information: We collect user details to form a reasonable belief that we know the identity of our users in a manner commensurate with the user's risk profile. This may include wallet address (where applicable), name, address, country, date of birth, and/or postal code.

Enhanced Due Diligence and Ongoing Monitoring

Power.win performs ongoing monitoring to detect behaviors or indicators that may raise suspicion of money laundering, terrorist financing, fraud, or other prohibited activity.

When one or more red flags are triggered, an account may be restricted, suspended, or placed under review while we conduct enhanced due diligence ("EDD").

This may include requesting:

- Full legal name
- Country of citizenship
- Permanent address
- Identification number
- Identification document
- Source of Funds and Source of Wealth

We may use third-party providers to verify the above information.

Acceptance Policy

Power.win will not accept, and may block or restrict, users who:

- Do not provide required identification
- Provide false or misleading information
- Attempt to conceal their location
- Are located in restricted jurisdictions

- Are subject to sanctions
- Use funds linked to restricted jurisdictions
- Present an unacceptable risk profile

Transaction Monitoring

Power.win conducts ongoing monitoring using a combination of in-house controls and third-party tools.

This includes:

- Identification of unusual activity
- Alert management and investigation

Monitoring measures include:

- Screening for sanctioned jurisdictions and parties
- Identification of unusual transaction behavior
- Anti-mixing detection measures
- Blockchain analytics (where applicable)
- Withdrawal threshold KYC controls

Virtual Assets and Cryptocurrency Risk Controls

Power.win operates in an environment involving virtual assets and cryptocurrencies and applies specific risk-based controls to mitigate associated AML/CFT risks.

These controls include:

- **Wallet Risk Assessment:** Screening wallet addresses using blockchain analytics tools to detect exposure to illicit activity, sanctions, or high-risk entities
- **Source of Funds Verification:** Requiring users to provide information on the origin of crypto assets where risk is elevated
- **Transaction Monitoring:** Monitoring for unusual patterns such as rapid fund movement, structuring, or use of obfuscation tools
- **Restricted Activities:** The Company may restrict or refuse transactions involving high-risk wallets, sanctioned entities, or anonymity-enhancing tools
- **Enhanced Due Diligence (EDD):** Applying additional checks where crypto-related risk is higher
- **Record Keeping:** Maintaining records of wallet addresses, transaction data, and risk assessments in line with regulatory requirements

Education and Training

Power.win may provide employees periodic AML, counter-terrorist financing, and sanctions compliance training, as appropriate.

Reporting

Power.win is obliged to report unusual or suspicious transactions in accordance with applicable requirements. Users linked to illicit activity may be reported to the competent authority.

Approval and Sign-Off

This AML Policy has been reviewed and approved by senior management of Super Awesome Gaming Alliance B.V.

Compliance Officer

Name: Florence Borg Farrugia

Signature: 
Date: 17/4/2026

Managing Director

Name: Claire Godschalk obo IGA Trust B.V.

Signature: 

Date: Apr 17, 2026

Contact Us

If you have any questions about this AML Policy, please
contact: support@power.win

power.win Signed

Final Audit Report

2026-04-17

Created:	2026-04-17
By:	Millicent Prince (millicent@igatrust.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAoANhyA5S0hNmR95uKktnlgXjvC8VNaKq

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-  Document created by Millicent Prince (millicent@igatrust.com)
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