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Curaçao

AML/CFT Policy

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Definitions and Abbreviations

Account Holder:	an individual who applied and was granted an account held at the internet gateway operated by the Company for the use of the provided Services, as a Player.
AML:	Anti Money Laundering. All efforts focused on the prevention of transforming proceeds obtained from criminal activities into funds which appear to be obtained from legal activities.
CFT:	Combating the Finance of Terrorism. All efforts focused on the prevention of providing funds at the disposal of terrorists to be used for committing terrorist attacks.
The Company	Cursile N.V., a limited liability company duly organized under Curaçao law registered with the Chamber of Commerce and Industry of Curaçao under number 150895.
FATF:	Financial Action Task Force (www.fatf-gafi.org)
FIU:	Financial Intelligence Unit of Curaçao.
KYC:	Know Your Client
Master Licence Holder:	Antillephone N.V., a company registered and licensed in Curaçao
MLRO:	Money Laundering Reporting Officer
Player:	Individual who has registered with the Company for the purpose of making use of the Services offered on the Website and for which an account has been opened providing him/her with a unique code.
Player Account:	an account granted to an individual after registration. The account is created and issued by the Company and is required for wagering with real money.
Service:	the gaming and betting offers provided by the internet gateway operated by the Company to the Account Holder, through the Website.
System:	the casino games offered on the Website.
Website:	the online gaming platform offering online gaming services operated by the Company.

1. AML/CFT Policy

1.1 Policy

Money laundering and the financing of terrorism are some of the ever-growing threats for national and international economies throughout the world, forcing all vulnerable sectors to have measures in place for the prevention of their misuse for these purposes.

The Company is committed to have procedures in place for the prevention of the misuse of its Services provided to Account Holders for money laundering, terrorism financing or other criminal purposes such as fraud.

1.2 Objective

The Company is a limited liability company, duly incorporated and registered in accordance with the laws of Curaçao. This policy is written based on the national legislation on AML, CFT and the penalization of predicate crimes of Curaçao and applicable international standards set by the FATF. Combined these regulations provide a solid, internationally accepted standard for the procedures maintained for the prevention of the misuse of the Services provided by the Company.

Proper Identification of Account Holders, verification of the identity, monitoring of Player activities and reporting of unusual activities are part of the measures the Company has in place in an effort to mitigate industry related risks.

1.3 Scope

The Company is committed to the highest national and international AML and CFT standards when providing its Services and requires management and employees to follow these standards.

2 Regulatory Framework

2.1 National regulations

Pursuant to the National Ordinance of Money Laundering (1993), money laundering is a criminal offence in Curaçao. Further main national regulations relating to money laundering and terrorist financing are amongst others:

- a) The Code of Criminal Law (Penal Code) (N.G. 2011, no. 48);
- b) The National Ordinance on the Reporting of Unusual Transactions (N.G. 1996, no. 21) as lastly amended by N.G. 2009, no. 65 (N.G. 2010, no. 41) (NORUT) together with all amendments thereto and all related National Decrees containing general measures and Ministerial Decrees with general operations;
- c) The National Ordinance on Identification of Clients when Rendering Services (N.G. 1996, no. 23) as lastly amended by N.G. 2009, no. 66 (N.G. 2010, no. 40) (NOIS) together with all amendments thereto and all related National Decrees containing general measures and Ministerial Decrees with general operations;
- d) The National Decree containing general measures on the execution of articles 9, paragraph 2, and 9a, paragraph 2, of the National Ordinance on Identification of Clients when rendering Services. (National Decree containing general measures on Penalties and Administrative Fines for Service Providers) (N.G. 2010, no. 70);
- e) Sanctions national decree Al-Qaida c.s., the Taliban of Afghanistan c.s. Osama bin Laden c.s., and terrorist to be designated locally (N.G. 2010, no. 93);
- f) National Ordinance on the Obligation to report Cross-border Money Transportation N.G. 2002, no. 74) together with all amendments thereto and all related National Decrees containing general measures and Ministerial Decrees with general operations;

These laws and decrees serve as the basis for the procedures maintained by the financial sector of Curaçao to detect and deter industry related risks for money laundering, the financing of terrorism or other criminal activities.

2.2 International regulations

As a member of the Financial Action Task Force (www.fatf-gafi.org) and of the Caribbean Financial Action Task Force (www.cfatf-gafic.org), Curaçao is meeting International standards by regularly implementing these standards in its national legislation.

On international level, the FATF plays a very important role in the combating of money laundering and the financing of terrorism and proliferation of weapons of mass destruction.

The FATF monitors the progress of its members in implementing necessary measures, reviews money laundering and terrorist financing techniques and counter-measures, and promotes the adoption and implementation of appropriate measures globally.

In performing these activities, the FATF collaborates with other international bodies involved in combating money laundering and the financing of terrorism. In total 34 countries are direct members of the FATF and through regional organizations over 180 countries are connected to the FATF.

Subsequently the present policy is a combination of the FATF and local AML/CFT rules and regulations. This ensures a solid, internationally accepted basis regarding AML/CFT. In case local laws and regulations require additional compliance duties, the Company is free to develop additional procedures to comply with local regulations.

3 Procedures

In an effort to be compliant with the applicable rules, regulations and international standards, the Company has procedures in place to which it attains itself to when providing Services to Account Holders. These procedures cover the following standards:

- Risk management
- Know Your Customer Procedure
- Monitoring of Account Holder activities
- Reporting of unusual transactions
- Recordkeeping

3.1 Risk Management

Based on the industry related risks, the Company maintains a nondiscretionary approach. All Account Holders are required to comply with the requirements as detailed in the KYC procedure and are submitted to the regular monitoring of their activities.

3.2 Know Your Customer Procedure

3.2.1 Identification & verification

An individual cannot make use of the Services unless that individual is over eighteen (18) years of age or any legal age at which gambling or gaming activities are permitted under the law or jurisdiction applicable to his person, and has successfully registered for an account. To register for an account an individual must register personally and provide the following information about his person:

- a. First and last name;
- b. Date of birth;
- c. Gender;
- d. ID card number;
- e. Full residential address;
- f. Telephone number;
- g. Valid email address and
- h. Username and a password.

The name on the account must match the true, legal name and identity of the individual. The username, password and other personal information related to the account must be kept secret and confidential and may not be used by any third party. In case of a suspected violation, an Account Holder must request new log-in credentials.

All applicants are required to submit proof of identity, proof of address and payment ID at moment of deposit of funds or where applicable at any given time requested by the Company.

Account holders are required to submit satisfactory documentation to proof the identity and residential address including but not limited to copies of:

- a. valid passport
- b. identify card
- c. driving license and/or
- d. recent utility bill not older than three months

On registration, a geographical location check is carried out on the applicant's computer IP to ensure that person is in a permitted jurisdiction. If the applicant is not in a permitted jurisdiction, he/she will not be allowed to continue the registration process. The Company will proceed to review the provided information within reasonable time and will contact the applicant and request further information in case the provided documentation is found to be unsatisfactory. A document may be considered unsatisfactory if it is not in English, is suspected to be fraudulent, is suspected to be obtained from a third party to perform illegal operations over the Internet, or for any other reason subject to the discretion of the Company. The applicant may be required to provide further information or information in the internationally accepted format, including but not limited to requesting official translation of legal documents with appropriate seals.

If the applicant does not succeed in providing sufficient information, refuses to do so or provides documentation not meeting the criteria (e.g. forged, altered, failing security checks), the Company may immediately proceed to permanently close the account without the refund of the deposited amount.

3.3 The Monitoring of Account Holder activities

The Company takes reasonable steps to prevent activities of money laundering and terrorism financing and constantly monitors all Player activities including financial habits and behavior in order to mitigate industry related risks such as money laundering, terrorism financing and other criminal activities such as fraud.

3.3.1 Unusual activities

The Company monitors the activities on the accounts for the presence of any unusual or suspicious. These activities include but are not limited to:

- Duplicate or multiple accounts

Any accounts containing the same personal information, IP address or bank account is considered to be a duplicate account. It is not permitted for an Account Holder to have duplicate accounts or manage more than one (1) account when using the Services on the site including

but not limited to the web-based version. If the Company becomes aware, suspects or believes that this might be the case it reserves the right to immediately terminate any and all accounts held and the account balances either deemed as forfeited by the holder in which event the deposit will be subject to further investigation by the Company. Any winnings arising from such behavior will be withheld.

- Collusion

Upon the suspicion of the multiple registration by Account holders acting in collusion or as a syndicate, the set up of fictitious accounts or the use of front men, the Company reserves the right to change or terminate any bonus offer, cancel any winnings and close accounts.

- Fraudulent activity

At the detection of any fraudulent activities including but not limited to the use of falsified documentation, activities related to multiple accounts, game manipulation, fraudulent payment or any other fraudulent activity or prohibited transaction (i.e. money laundering), the Company will proceed to close the account(s). Any winnings arising from such activities shall be revoked or confiscated and the deposited amount will be subject to further investigation.

If any of mentioned activities have led the Company to suffer any losses, the account will be closed and any bad debts recovered using methods which are lawfully available to the Company e.g. engagement of collection agencies.

3.3.2 Deposit and Withdrawal

All financial transactions must match the name of the credit card or other payment accounts through which the account is funded or money is withdrawn. Any inconsistencies will be considered a breach of the Terms and Conditions of the Company. The transaction will be suspended and the account subject to further investigation.

- Deposits

An Account Holder is only permitted to use its personal information and personal bank account. The information provided on the deposit form must be identical to the pertaining data held by the Company.

An Account Holder may deposit money in his account only in order to play and use the offered Services and may only withdraw earned winnings from the account. An Account Holder who deposits and withdraws without gaming activities will have the funds blocked until further notice.

Furthermore, the Company will not grant interest on deposits. The Company reserves the right to apply certain restrictions to the payment methods in selected countries and/or for certain Players.

- Withdrawal

Withdrawal requests can only be addressed to the Account Holder registered on the account. The provided information on the withdrawal form must be identical to the personal data held by the Company. Withdrawal requests made to other parties will not be taken into consideration.

An Account Holder can only make a withdrawal request once the initial deposit amount is fully used and specific bonus terms of a bonus must be satisfied before requesting its withdrawal.

3.3.3 Security review

The Company reserves the right to conduct a review at any time to validate the identity, age and/or registration data provided by the Account Holder in order to verify the use by the Customer of the provided services for any breach of the Terms and Conditions and any applicable laws. At the moment of registration the applicant provides the Company with authorization to make any relevant inquiries pertaining to his person and to use and disclose information to any third party considered necessary in order to conduct its verification checks. Third party agencies may be engaged in an effort to confirm the provided age, identity, address and payment details, the ordering of a credit report and/ or the verification of the provided information by checking it against certain public or private databases. All applicant/ Account holders are made aware that by accepting the Terms and Conditions of the Company, they agree that the provided information may be used, recorded and disclosed and that the data may be recorded by the Company or third party engaged.

The review may be performed from time to time at the discretion of the Company and/or due to regulatory, security or other business reasons,

During the review the Customer may be restricted from withdrawing funds from the account and/ or prevented from accessing certain Services offered on the website.

3.4 Reporting of unusual transactions

Any unusual transactions or circumstances for which the Company has not received sufficient explanation may give rise to its report to the FIU in Curaçao. The Company will hold a list of

all instances in which it did not consider it necessary to report to the relevant authority. The decision not to report will need to be sufficiently supported.

3.5 Recordkeeping

The Company maintains a record of all relevant documentation on a separate database for at least five years after ending a business relationship. The Company is obliged to retain files in a way that enables investigating authorities to identify a satisfactory audit trail for individual transactions including the amounts, currencies and type of transactions.

In specific circumstances, if ordered by rule of law and permitted by national law and the relevant authorities, the Company may provide copies of the records maintained.

3.6 Staff Due Diligence

It is imperative that the Company's employees are of undisputed integrity. To ensure this objective, the Company follows a procedure whereby all applicants must produce a curriculum vitae, at least two references and relevant educational qualification certificates, and/or professional certificates, which are checked and verified by the Company's Human Resources Department.

Acknowledged by:

C Drommond

eMoore N.V.
Title: Managing Director
Date: 08/10/2024

Executed by Cornelia Drommond as
Proxy Holder to eMoore N.V.

