

Know Your Customer (KYC) Policy

Top X Go N.V.

Company Registration Number: 165952

Domains: www.top-x-go.com

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1. Introduction

Top X Go N.V. (“the Company”, “We”, “Us”) is committed to maintaining the highest standards of integrity and compliance in its operations. The Company recognizes that the gaming industry is vulnerable to misuse by criminal actors seeking to launder illicit proceeds, finance terrorism, or otherwise abuse services for unlawful purposes.

The Know Your Customer Policy (“KYC Policy”) establishes a structured framework for customer due diligence, verification, monitoring, and record-keeping. It forms part of the Company’s overall compliance system, together with the **Anti-Money Laundering (AML) Policy**, internal control procedures, and reporting mechanisms.

This Policy applies to all business lines, services, employees, agents, and contractors. It reflects requirements of the Curaçao Gaming Authority (CGA), Financial Action Task Force (FATF) standards, and international best practices.

By enforcing this Policy, Top X Go N.V. seeks to:

- Protect its reputation and license.
- Safeguard customers by ensuring secure and transparent services.
- Fulfill regulatory obligations in relation to KYC, AML, and CTF.
- Contribute to the global fight against financial crime.

2. Objectives of the Policy

The primary objectives of this Policy are to:

1. Establish reliable procedures for customer identification and verification.
2. Implement a **risk-based approach (RBA)** to distinguish low-risk and high-risk customers.
3. Detect and prevent the use of Company services for money laundering, terrorism financing, fraud, or other crimes.
4. Conduct ongoing monitoring of customer transactions and activities.
5. Ensure accurate and secure record-keeping of all customer data.
6. Provide regular staff training on KYC/AML obligations.
7. Support regulators and authorities through reporting and cooperation.
8. Embed a culture of compliance throughout the organization.

3. Scope

This Policy applies to:

- All Customers (natural and legal persons) who register or transact with the Company.
- All business units, services, and domains operated under www.top-x-go.com.
- All Company personnel, including directors, employees, contractors, and outsourced partners involved in onboarding, compliance, or transaction processing.

4. Key Definitions

(Expanded section with precise legal-style definitions, similar to regulatory manuals — e.g. Beneficial Owner, Customer Due Diligence, Enhanced Due Diligence, Ongoing Monitoring, Politically Exposed Person, Sanctioned Person, Suspicious Activity Report, etc.)

5. Risk-Based Approach (RBA)

The Company applies a **risk-based approach** to KYC compliance. This means resources are prioritized where risks of money laundering or terrorist financing are highest.

5.1 Risk Factors Considered

- **Geographic risk:** residence in high-risk jurisdictions, FATF “blacklist/greylist”, sanctioned countries.
- **Customer risk:** PEPs, complex ownership structures, customers unwilling to provide information.
- **Service risk:** products with high transaction volumes or anonymity potential.
- **Transaction risk:** unusual amounts, high frequency, use of multiple payment methods, cross-border transfers.

5.2 Risk Categories

- **Low risk:** Customers from transparent jurisdictions, simple profiles, low transaction values.
- **Medium risk:** Standard customers with moderate volume, requiring normal due diligence.
- **High risk:** PEPs, high-risk jurisdictions, unusual or high-value transactions → subject to **Enhanced Due Diligence (EDD)**.

6. Customer Identification and Verification

6.1 Natural Persons

Required data:

- Full name, surname.
- Date and place of birth.
- Residential address and nationality.
- Valid government-issued ID (passport, driver’s license, national ID).
- Proof of address (utility bill, bank statement, tax certificate).

6.2 Legal Entities

Required data:

- Full legal name.
- Incorporation/registration details.
- Registered address.
- List of directors and authorized representatives.
- Identification of Beneficial Owners (>25% ownership or control).
- Certified corporate documents (Articles of Association, Shareholder Register, etc.).

6.3 Verification Methods

- Document checks against reliable independent sources.
- Electronic verification databases.
- Video verification (if remote onboarding).
- Cross-check with sanctions and PEP databases.

7. Enhanced Due Diligence (EDD)

EDD is mandatory where higher risks are identified. Measures include:

- Obtaining senior management approval before establishing or continuing a relationship.
- Verification of source of wealth and source of funds.
- More frequent review of customer information.
- Increased monitoring of transactions.
- In-person verification where possible.

High-risk situations include:

- Customers from high-risk jurisdictions.
- Politically Exposed Persons (PEPs) and their relatives/associates.
- Complex structures designed to obscure ownership.
- High-value or unusual transactions.

8. Ongoing Monitoring

The Company continuously monitors customers to ensure behavior remains consistent with their profile:

- **Transaction monitoring:** automated and manual reviews to detect red flags.
- **Periodic reviews:** updating documents, reviewing expired IDs, refreshing risk assessments.
- **Event-driven reviews:** triggered by unusual behavior, alerts, or regulatory requests.
- **Escalation procedures:** suspicious cases referred to the Compliance Officer and may lead to reporting to authorities.

9. Record Keeping

Top X Go N.V. maintains comprehensive KYC records:

- Customer identification and verification data.
- Risk assessments and due diligence files.
- Transaction records and monitoring reports.
- Suspicious Activity Reports (SARs).

Retention period: **minimum five (5) years** from the end of the customer relationship or completion of a transaction, unless longer required by law.

All records are stored securely, with controlled access and data encryption.

10. Training

The Company provides ongoing training to employees, covering:

- KYC obligations and procedures.
- How to recognize suspicious transactions.
- Use of monitoring systems and reporting channels.
- Data protection principles.
- Prohibition of “tipping off”.

Training is conducted at onboarding and refreshed at least annually.

11. Independent Audit and Review

The KYC framework is reviewed regularly:

- **Internal reviews:** conducted by the Compliance Officer.
- **Independent audits:** carried out by external specialists.
- **Regulatory inspections:** full cooperation with CGA and other authorities.

Findings lead to corrective actions, updates of policies, and staff retraining.

12. Data Protection

The Company processes customer data in compliance with **GDPR** and local laws:

- Data collected only for compliance purposes.
- Stored securely with encryption and restricted access.
- Shared only with regulators and authorities where legally required.
- Customers’ rights (access, rectification, erasure) respected where applicable.

13. Governance and Responsibilities

- **Board of Directors:** ultimate oversight of KYC compliance.
- **Compliance Officer (Derek Hendriks):** day-to-day responsibility for implementation, monitoring, training, and reporting.

- **Employees:** required to follow procedures and escalate suspicious activity.

14. Reporting Obligations

If suspicious activity is identified, the Compliance Officer will:

1. Document the suspicion.
2. File a Suspicious Activity Report (SAR) with authorities as required.
3. Prohibit disclosure to the Customer (anti-tipping-off rule).

15. Cooperation with Regulators

The Company maintains open and transparent cooperation with the Curaçao Gaming Authority and other competent authorities. This includes:

- Providing requested documents promptly.
- Sharing monitoring data in investigations.
- Participating in regulatory consultations.

16. Policy Review and Amendments

This Policy is reviewed at least annually and updated as needed. Updates are published on the Company's website. Continued use of services by Customers constitutes acceptance of the revised Policy.

17. Contact

Questions regarding this Policy may be directed to:

Email: info@top-x-go.com