

SEVENTIP N.V

CUSTOMER ACCEPTANCE

POLICY



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The policy will be reviewed on the following basis: No less than once annually, with such review to be initiated by the Policy owner approximately one month prior to the date following 12 months from which the procedure was last approved. • In response to any changes in relevant regulation and/ or legislation. • In response to general guidance notes or best practice guidance issued by any relevant regulator. • In response to any regulatory action taken against any operator by any relevant regulator. • In response to findings of a relevant internal or external audit; or • Upon request of the management of Seventip N.V	
NAME	ROLE
Mark Taylor	Money Laundering Reporting Officer

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Introduction

This Customer Acceptance Policy “CAP” outlines the comprehensive measures and procedures that must be implemented by all operators under a Curacao license to comply with the Anti-Money Laundering (AML) and Counter-Financing of Terrorism (CFT) regulations. These regulations are aligned with the Financial Action Task Force (FATF) recommendations and the various AML/CFT/CFP legislations in Curacao.

Regulations and Legislation

Below is a list of all the relevant AML legislation and regulations pertaining to the Curacao License:

- Curacao Gaming Board Regulations for AML/CFT
- National Ordinance on identification when rendering services (N.G.2017, no 92)
- NORUT – National Ordinance on the Reporting of Unusual Transactions (N.G 2017, no 99)
- Sanctions National Ordinance (N.G 2014, no 55)
- Kingdom Sanction Act (N.G 2016, no 54)
- National Decree entering into force of Kingdom Sanction Law (N.G 2017, no 2)
- The code of Criminal Law (Penal Code) N.G 2011, no 48)
- National Ordinance on Games of Chance (LOK)

Description of High-Risk Players

- Players with complex or unusual large transactions.
- Players from high-risk jurisdictions as identified by the FATF.
- Players with no clear source of funds or wealth.
- Politically Exposed Persons (PEPs); &
- Players with a history of criminal activities or connections to criminal organizations.

Risk Indicators

- **Low Risk:** Players with transparent and verifiable sources of income;
- **Medium Risk:** Players with slightly complex financial backgrounds; &
- **High Risk:** Players with unusual transaction patterns or from high-risk jurisdictions.
- Customer Due Diligence (CDD Measures
- Verification of player identity using reliable, independent source documents such as government-issued IDs;
- Continuous monitoring of player transactions and activities to identify unusual patterns; • Enhanced due diligence for high-risk players, including PEPs, which may involve deeper background checks and source of funds verification; &
- Regular updates and reviews of CDD information to ensure accuracy and completeness.

Declining Service

- The player fails to provide the required identification or verification documents.
- The player is identified as posing an unacceptable level of risk based on CDD measures.
- The player is found to be involved in illegal activities; &
- The player is subject to international sanctions or listed on relevant watchlists.

Politically Exposed Persons (PEP) and Sanctions Screening

- Regularly updating PEP and sanctions lists based on reliable sources.
- Implementing procedures to identify and manage risks associated with PEPs, including enhanced monitoring and reporting requirements.
- Ensuring compliance with national and international sanctions requirements by cross referencing players against updated sanctions lists; &
- Immediate reporting of any matches or suspicions to the relevant authorities.

Criteria for Acceptance of Customers

The following are the criteria for acceptance of customers:

- No account shall be opened in anonymous or fictitious name(s);
- The registration is not from a restricted jurisdiction.
- Residents in high-risk jurisdictions deemed by FATF/EU Sanctions and Basel Index are not permitted to register account on the site.
- Only one account per Customer is allowed.
- The company will apply due diligence measures in line with the perceived risk rating of the customer. Measures will include PEP screening and sanctions screening.
- All PEP's and Sanctioned persons are considered as high risk and are not permitted to open an account or play.
- The company closes an account if it is unable to apply the appropriate due diligence measures.
- Age verification of customers is required.
- The company will take the necessary steps to ensure that any new registration is not from a customer who has an active self-exclusion in place;
- The company will risk assess all customers and come up with a risk profile for all customers.
- The company will close any customer accounts who have been the subject of a previous conviction for money laundering, financing of terrorism, drug trafficking, human trafficking, or any serious proceeds-generating crime.
- Customers who have been the subject of previous conviction for money laundering, financing of terrorism, drug trafficking, human trafficking, or any serious proceeds-generating crime;
- The customer's risk rating must fall within the risk appetite of the company.
- The company will conduct a customer risk assessment at the following stages:
 - Upon onboarding a new customer.
 - When a customer reaches total deposits of over €2K;
 - Customer's activity/behaviour is not in line with their normal risk profile.
 - Reaching the SOW/SOF threshold; &
 - As part of on-going monitoring.
- Customers rated as high risk are requested to provide enhanced due diligence documentation/information.

Conclusion

This CAP outlines the necessary controls and procedures to ensure compliance with AML/CFT regulations. Regular reviews and updates to this policy will be conducted to ensure ongoing compliance with regulatory changes and emerging risks.