

ANTI-MONEY LAUNDERING/COMBATING THE FINANCING OF TERRORISM

The AML Policy outlines the commitment of Interactive Betting NV, operating under a license issued by CGB, to prevent and mitigate the risk associated with money laundering and the financing of terrorism in connection with its online gaming operations.

Fan-Sport website carries out all appropriate measures to combat money laundering and international terrorism (AML Policy). Thus, the Company has a strong position to prevent all kinds of illegal activity. To fulfill these obligations, the Company is bound to inform competent authorities if there is a reason to suspect that funds which were deposited by the User into his account are related to illegal activity or terrorism financing. The company is also obliged to block such funds and to undertake measures provided for by the rules of the AML policy. The company is fully committed to be constantly vigilant to prevent money laundering and combat the financing of terrorism in order to minimize and manage risks such as the risks to its reputational risk, legal risk and regulatory risk.

Money laundering means:

- hiding or keeping privacy regarding the information about the real source, location, disposal, movement, ownership or other property rights related to property obtained as a result of illegal activity,
- conversion, moving, obtaining, possession or use of property which was got as the result of criminal activity for the purpose of concealing the illicit source of such property or assisting persons involved in crime to avoid legal consequences of their actions,
- a situation in which the property was obtained as a result of criminal activity committed on the territory of another state.

Legal Framework: The company complies with applicable laws and regulations, including but not limited to:

- National Ordinance on the Reporting of Unusual Transactions (NORUT)
- National Ordinance on Identification for Service Providers (NOIS)
- International Standards including FATF Recommendations
- Best practices in AML/CTF applicable to online gaming operators

To monitor in accordance with the legal requirements, the Company has established a Compliance Department that develops Anti-money laundering measures and Know Your Client procedures (AML / KYC), which are obligatory for all employees of the Company. The Department also determines the policy of engagement with those registered and holding accounts (hereinafter – “the Clients”) on the Company website (hereinafter – “the Website”).

The Compliance Department is intended to ensure that all the operations of the Company are consistent with the international standards for combating money laundering and terrorist financing and that all the documents provided by the Client are up to date and fully comply with the relevant legal requirements. As a result, by opening an account on the Website the Client unconditionally accepts the Company policy, agrees with the following rules and undertakes to observe them. This

policy applies to all individual and corporate customers who register and use the gambling services offered by our platform, including deposits, bets, withdrawals, and use of bonus systems.

When you open an account, you declare, taking all liability for any miscommunication that you:

- are at least 18 years old or the legal gambling age in your jurisdiction if it requires an older age.
- Reside in a jurisdiction where online gambling is not prohibited by law
- Are not a subject to international sanctions, not appear on watchlists, and are not known as a high-risk individual or entity.
- Have not been previously banned or excluded from Fan Sport platform for fraud, abuse or policy violations.

When you open an account, you agree to undertake the following obligations:

- You agree that you comply with all applicable laws and regulations on combating money laundering and terrorism financing, including the AML Policy.
- You confirm that you have no information or any suspicions about the fact that funds used for depositing in the past, present or future, are received from any illegal source, or have any relation to legalization of income obtained illegally, or other unlawful activity prohibited by applicable law or the instructions of any international organizations;
- You agree to immediately provide any information we think fit to require according to applicable laws and regulatory requirements in respect of combating the legalization of funds obtained illegally.
- You agree to undertake to make every effort to avoid direct or indirect complicity in any illegal financial activities and any other illegal transactions using the website.
- You guarantee the legal origin, ownership and right to use the funds deposited to your account.
- You agree that you undertake to respect the legal norms, including international norms that aim to combat illegal money transfers, financial fraud, money laundering and legalization of funds obtained by illegal means

The client understands and agrees that if any evidence of suspicious transactions is discovered on the client's account, cash deposits from questionable sources and/or any actions and signs of fraud, the company reserves the right to conduct an internal investigation, block or close the client's account, cancel any payments and suspend operations on the account until the end of the official investigation.

The company collects and keeps the passport or other ID of the User, and reports on all changes made in the account. The company can request at any time additional documentation if it deems necessary upon times in order to complete their AML checks and compliance standards.

Customers are continuously monitored for changes in behavior profile. The company monitors any suspicious activity on the User's account, as well as operations carried out under special conditions;

The Client undertakes to respect the legal norms, including international norms that aim to combat illegal money transfers, financial fraud, money laundering and legalization of funds obtained by illegal means.

The Client undertakes to make every effort to avoid direct or indirect complicity in illegal financial activities and any other illegal transactions using the Website.

The Client guarantees the legal origin, legal ownership and the right to use the funds deposited to their account.

The company has the right to ban the User at any time, if the Company has grounds for supposing that this operation has any relation to money laundering and criminal activity. In accordance with international law the Company is not obliged to inform the User about his suspicious activity and let him know that it has been passed to relevant authorities. The company is also not obliged to inform Client or other individuals about measures taken to counter the legalization (laundering) of proceeds from crime and terrorist financing.

In accordance with the internal AML procedures the Company performs initial and ongoing personal identity verification procedures as provided by the level of risk of each User.

- The company will ask you to provide the minimal information to confirm your identity.
- The company will record and preserve all data and ID, as well as which methods of confirmation have been used and the results of verification procedures.
- The company will check your personal data to match the list of persons suspected of terrorism, which is formed by the authorized state and independent authorities. A minimum set of identification data includes: the User's full name; date of birth (for individuals); residential address or registered address of the User; sources of funds that you plan to Deposit into the account.

To verify and confirm the authenticity of the above-mentioned data, the Company require the following documents, from all players

- full name, date of birth and nationality
- government issued ID (passport, ID card, or driver's license)
- proof of residential address (utility bill, bank statement etc., not older than three months)
- proof of source of funds or source of wealth

The company may also require other additional information, confirmed by relevant documents. In certain cases, the Company may also require notarized copies of documents from the User.

Each customer is evaluated and assigned a risk level based on:

- country of residence
- PEP status or known affiliation
- Deposit behavior and transactional activity
- Use of tools like VPNs or crypto-mixers

Users understand and agree that Fan-Sport will not onboard customers who:

- Provide false, incomplete or misleading registration details
- Are residents of high-risk or sanctioned jurisdictions
- Are flagged through internal monitoring or external watchlists
- Attempt to circumvent controls using proxies, multiple accounts or identity fraud
- Have self-excluded from gambling or exhibit signs of gambling addiction.

The Company is obliged to share information about the User with financial institutions and law enforcement agencies, as required by the applicable laws, and has the right to do so without obtaining prior consent. By using the website, the Client gives the company their consent to perform these actions.

In compliance with the previous paragraph, the company holds all information about the Client and their betting history and payment transactions for at least five years after the relationship has ended.

The Company is obliged to exercise extensive scrutiny to Clients classified as a high-risk jurisdiction.

Users understand and agree that the company's refusal to perform transactions which are considered by the Company as suspicious (including the blocking or closing of the Player's account) does not constitute a ground for civil liability of the company to fulfill obligations to the Client.

This anti-money laundering policy is an integral part of the Client Agreement governing the terms by which the Client opens and uses an account of the website.



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