

ANTI-MONEY LAUNDERING (AML) POLICY

Introduction

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.

Objective of the AML Policy

www.fan-sport.com seeks to offer the highest level of security to its users. A three-step account verification process is implemented to verify customer identity, ensure

payment methods are legitimate, and establish a framework for combating money laundering and terrorist financing. Risk-based measures are applied depending on nationality, payment method, and transaction behavior.

Regulatory Framework

The AML Program is designed to comply with:

- EU Directive 2015/849
- EU Regulation 2015/847
- EU Sanctions Regulations
- International Standards including FAFT Recommendations
- Curaçao AML/CFT Regulations

AML Governance Structure

The responsibility for AML compliance lies with the full management of our Compliance Officer oversees implementation and enforcement under direct management supervision.

Customer Verification – Step One

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

Mandatory for withdrawals. Users must complete a form including personal identification details such as name, date of birth, nationality, gender, and full address.

Customer Verification – Step Two

Step two verification:

Step two verification must be done by every user in the following circumstances:

- Players engage in financial transactions equal to or exceeding NAf. 4,000 (USD equivalent).
- Players carry out occasional transactions exceeding the monetary equivalent of NAf. 4,000 (USD equivalent), whether as a single transaction or a series of related transactions.
- There is a suspicion of money laundering (ML) or terrorist financing (TF).
- The Company has doubts about the veracity or adequacy of previously obtained customer identification data

Until step two verification is done the withdraw, tip or deposit will be hold. Step to verification will lead the user to send in his ID. The user/customer must make a picture of his ID. While a paperclip with a six-digit random generated number is next to his ID: Only an official ID may be used for ID verification, depending on the country the variety of accepted IDs may be different.

KYC & Proof of Address

The formal identification of customers on entry into commercial relations is a vital element, both for the regulations relating to money laundering and for the KYC policy.

This identification relies on the following fundamental principles:

A copy of your passport, ID card or driving license, each shown alongside a handwritten note mentioning six random generated numbers. Also, a second picture with the face of the user/customer is required. The user/customer may blur out every information, besides date of birth, nationality, gender, first name, second name and the picture. To secure their privacy.

Please note that all four corners of the ID have to be visible in the same image and all details has to be clearly readable besides the named above. We might ask for all details if necessary.

An employee may do additional checks if necessary, based on the situation.

Source of Funds

If a player deposits over a five thousand euro there is a process of understandings the source of wealth (SOW)

Examples of SOW are:

- Ownership of business
- Employment
- Inheritance
- Investment
- Family

It is critical that the origin and legitimacy of that wealth is clearly understood. If this is not possible an employee may ask for an additional document or prove.

The account will be frozen if the same user deposits either this amount in one go or multiple transactions which amount to this. An email will be sent to them manually to go through the above and an information on the website itself.

www.fan-sport.com also asks for a bank wire/credit card to further insure the Identity of the user/customer. It also gives additional information about the financial situation of the user/customer.

Basic document for step one:

The basic document will be accessible via the setting page on www.fan-sport.com. Every user has to fill out the following information's:

- First name
- Second name
- Nationality
- Gender
- Date of Birth

Screening

Sanctions & Politically Exposed Person: sanction lists typically contain those involved with organized crime, financial crime, and terrorism or are blocked for political reasons. The main aim of applying additional scrutiny to players who are classed as a PEP is to mitigate the risk that the proceeds of bribery and corruption may be laundered, or are assets stripped from their country of origin. While screening the players attention should be paid to the following:

- match by name and surname (need to consider features of transliteration of name and surname in different countries);
- date of birth (if available);
- gender (male/female);
- primary country;
- appearance.

Risk Management

Countries are classified into low, medium, and high risk regions. High-risk regions are prohibited. Verification thresholds vary by risk classification.

Region one: Low risk:

For every nation from the region one the three-step verification is done as described earlier.

Region two: Medium risk:

For every nation from the region two the three-step verification will be done at lower deposit, withdraw and tip amounts. Step one will be done as usually. Step two will be done after depositing 1000\$ (one thousand Dollars), withdrawing 1000\$ (one thousand Dollars) or tipping another user/customer 500\$ (five hundred Dollars.) Step three will be done after depositing 2500\$ (two thousand five hundred Dollars), withdrawing 2500\$ (two thousand five hundred Dollars) or tipping another user/customer 1000\$ (one thousand Dollars). Also, users from a low risk region that change crypto currency in any other currency will be treated like user/customers from a medium risk region.

Region three: High risk:

Regions of high risks will be banned. High risk regions will be regularly updated to keep up with the changing environment of a fast-changing world.

Transaction Monitoring

AML-Compliance ensures that an “ongoing transaction monitoring” is conducted to detect transactions which are unusual or suspicious compared to the customer profile. This transaction monitoring is conducted on two levels:

1) The first Line of Control:

www.fan-sport.com works solely with trusted Payment Service Providers whom all have effective AML policies in place as to prevent the large majority of suspicious deposits onto www.fan-sport.com from taking place without proper execution of KYC procedures onto the potential customer.

2) The second Line of Control:

www.fan-sport.com makes its network aware so that any contact with the customer or player or authorized representative must give rise to the exercise of due diligence on transactions on the account concerned. In particular these include:

- Requests for the execution of financial transactions on the account;
- Requests in relation to means of payment or services on the account;

Also, the three-step verification with adjusted risk management should provide all necessary information's about all costumers of www.fan-sport.com at all time.

Also, all transaction must be overseen by employees over watched by the AML compliance officer who is over watched by the general management.

The specific transactions submitted to the customer support manager, possibly through their Compliance Manager must also be subject to due diligence.

Determination of the unusual nature of one or more transactions essentially depends on a subjective assessment, in relation to the knowledge of the customer (KYC), their financial behaviour and the transaction counterparty.

These checks will be done by an automated System, while an Employee crosschecks them for additional security.

The transactions observed on customer accounts for which it is difficult to gain a proper understanding of the lawful activities and origin of funds must therefore rapidly be considered atypical (as they are not directly justifiable).

Any www.fan-sport.com staff member must inform the AML division of any atypical transactions which they observe and cannot attribute to a lawful activity or source of income known of the customer.

3) The third Line of Control:

As a last line of defence against AML www.fan-sport.com will do manually checks on all suspicious and higher risk users in order to fully prevent money laundering.

If fraud or Money Laundering is found the authorities will be informed.

Suspicious Transaction Reporting

In its internal procedures, www.fan-sport.com describes in precise terms, for the attention of its staff members, when it is necessary to report and how to proceed with such reporting.

Objective indicators of unusual transactions include:

- Transactions reported to police or judicial authorities.
- An intended transaction involving a natural or legal person listed on a UN or EU sanctions list.
- Transactions equal to or exceeding NAf. 5,000 (USD equivalent) including bank transactions, sales of chips or credits, and payments of prizes.
- Transactions where there is reason to assume possible connections to ML or TF.

Submission via goAML Portal:

- Reports must be submitted through the goAML portal at <https://portal.fiucuracao.cw>. Companies must register to gain access to this portal, and all reports should be submitted in English.

Reporting Timeline:

- Reports of transactions that meet objective indicators must be submitted within 48 hours of the transaction occurring

Record Keeping

The Company must retain the following records and information for a period of five years after the end of a business relationship with a client or after the date an occasional transaction was completed:

- Copies and information for compliance with the Client Identification process
- Evidence and records of transactions both domestic and international
- Correspondence documents with clients

- Suspicious Transaction Reports and/or Suspicious Activity Reports performed by staff members including the examination performed by the CO, the corresponding findings and any subsequent communication with FUI Curacao.
- Player risk profile

These data will be safely, encrypted stored offline and online.

Training & Awareness

Employees receive mandatory AML training and periodic updates aligned with regulatory developments.

Auditing

Internal audits are conducted regularly to assess AML compliance.

Data Protection

All personal data is protected under EU Data Protection Directive 95/46/EC and applicable laws.

Contact

For questions regarding AML & KYC Policy, please contact Customer Support: support@fan-sport.com.