

**ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING
PROCEDURE**

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1. DEFINITIONS

1.1.AML - Anti-Money Laundering

1.2. CFT - Combating the Financing of Terrorism

1.3. Money Laundering –

1.3.1. the conversion or transfer of property, in the knowledge that such property is derived from a criminal act or from involvement in such an act, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such activity to evade the legal consequences of his action;

1.3.2. the concealment or disguise of the true nature, origin, source, location, disposition, movement, rights with respect to, or ownership of property, in the knowledge that such property is derived from a criminal act or from involvement in such an act;

1.3.3. the acquisition, possession or use of property, in the knowledge, at the time of acquisition/transfer, that such property was derived from a criminal act or from involvement in such an act;

1.3.4. preparation attempts to commit and association to commit any of the acts referred to in points 1.3.1., 1.3.2. and 1.3.3. of this paragraph.

1.4. Terrorist financing - the financing and supporting of an act of terrorism and commissioning thereof within the meaning of Terrorist organization.

1.5. Terrorist organization - membership in a permanent organization consisting of three or more persons who share a distribution of tasks and whose activities are directed at the commission of a criminal offence provided in section 1.18 as well as forming, directing or recruiting members to such organization.

1.6. Acts of terrorism - commission of a criminal offence against international security, against the person or the environment while posing a threat to life or health, against foreign states or international organizations, or of a criminal offence dangerous to the public, or manufacture, distribution or use of prohibited weapons, illegal seizure, damaging or destruction of property to a significant extent, or interference with computer data or hindrance of functioning of computer systems as well as threatening with commission of such acts, if committed with the purpose of forcing the state or an international organization to perform an act or omission, or seriously interfering with or destroying the political, constitutional, economic or social structure of the state, or seriously interfering with or destroying the operation of an international organization, or seriously terrorizing the population.

1.7. Politically exposed natural person (PEP) means a natural person who is or who has been entrusted with prominent public functions including a head of State, head of government, minister and deputy or assistant minister; a member of Parliament or of a similar legislative

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body, a member of a governing body of a political party, a member of a Supreme Court, a member of a court of auditors or of the board of a Central Bank; an Ambassador, a Chargé d'Affaires and a high-ranking officer in the armed forces; a member of an administrative, management or supervisory body of a State-owned enterprise; a director, deputy director and member of the board or equivalent function of an international organization, except middle-ranking or more junior officials.

1.8. PEP close associates –

1.8.1. natural persons who are known to have joint beneficial ownership of legal entities or legal arrangements, or any other close business relations, with a PEP;

1.8.2. natural persons who have sole beneficial ownership of a legal entity or legal arrangement which is known to have been set up for the de facto benefit of a PEP.

1.9. PEP close relatives (family members) -

1.9.1. the spouse, or a person considered to be equivalent to a spouse, of a PEP;

1.9.2. the children and their spouses, or persons considered to be equivalent to a spouse, of a politically exposed person; the parents of a PEP.

1.10. Compliance officer - an officer or employee with sufficient knowledge of the institution's money laundering and terrorist financing risk exposure and sufficient seniority to take decisions affecting its risk exposure, and who need not, in all cases, be a member of the management board.

1.11. Unusual monetary operation or transaction - a monetary operation or transaction relating to property which is suspected of being, directly or indirectly, derived from a criminal act or from involvement in such an act and/or is, suspected of being associated with terrorist financing.

1.12. Approved age -

1.12.1. the full age of eighteen (18) years; or

1.12.2. the age that is required to participate in a game of chance under the laws of the jurisdiction in which a person is a resident.

1.13. Customer (client) - a player, who has the approved age and who participates in a game of chance.

2. INTRODUCTION

2.1. The Anti-Money Laundering and Counter-Terrorism Financing Procedure outlines the general unified standards and procedures of anti-money laundering and combating terrorism financing.

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This document is a general guide defining Anti-Money Laundering (AML), Counter Terrorist Finance (CTF), Counter Fraud Procedures, regulations, Risk-Based approach.

2.2. Money Laundering is the process by which criminals attempt to hide and disguise the true origin and ownership of the proceeds of their criminal activities, thereby avoiding prosecution, conviction and confiscation of the criminal funds. Terrorist financing can be similarly described although the funds used for terrorist financing may in fact be of legitimate origin.

2.3. The ability to launder the proceeds of criminal activity through the financial systems of the world is vital to the success of criminal operations. Money is the lifeblood of terrorist organizations and vital to the mounting of terrorist activity.

2.4. Throughout this policy the term AML and CFT are to be used interchangeably.

2.5. Historically, efforts to combat money laundering concentrated on the activities of the traditional banking sector. However, criminals have responded to the measures taken by banks over recent years. They have invested in other methods of converting illegally obtained money.

2.6. will always seek to disrupt this activity by cooperating fully with the authorities and reporting all suspicious activity to Financial Intelligence Unit Curaçao.

2.8. All Omega Entertainment N.V. staff members are responsible for considering the AML manual and understanding responsibilities. All staff members must ensure that Omega Entertainment N.V. procedures are adhered to and must obtain all documentary evidence as outlined within Procedure. In addition, staff members must ensure that all suspicious circumstances are immediately reported to compliance officers.

2.9. All contact with Law Enforcement Agencies will be handled by the designated compliance officers or their deputies.

2.10. The Compliance officers are responsible for providing and distributing information and updates to the legislation as and when they occur.

3. LEGISLATION

The main laws or executive decrees relating to money laundering and terrorist financing are:

3.1. The Code of the Criminal Law (Penal Code);

3.2. The National Ordinance on the Reporting of Unusual Transactions (NORUT);

3.3. National Ordinance of 23 November 2015 amending the National ordinance on reporting unusual transactions;

3.4. National Decree providing for general measures, of 8th August 2011, for the implementation of articles 1, first paragraph, subsection a, under 16°, and 22h, second paragraph, of the National Ordinance on the Reporting of Unusual Transactions (National

Decree designating services, data and supervisors under National Ordinance on the Reporting of Unusual Transactions;

3.5. Ministerial Decree with general operation of December 1, 2015, laying down the indicators on the Reporting of Unusual Transactions (Decree Indicators Unusual Transactions);

3.6. The National Decree containing general measures on the execution of articles 22a, paragraph 2, and 22b, paragraph 2, of the National Ordinance on the Reporting of Unusual Transactions. (National Decree penalties and administrative fines for reporters of unusual transactions;

3.7. The National Ordinance on Identification of Clients when Rendering Services (PB 2017 nr. 92 consolidated text);

3.8. 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);

3.9. Ministerial Decree with general operation of March 15, 2010, for the execution of the NOIS (N.G. 2010, no.11);

3.10. Ministerial Decree with general operation of March 15, 2010 for the execution of the NORUT (N.G. 2010, no.10);

3.11. State Sanction Act;

3.12. PB 2014 no 55 Sanction Regulation;

3.13. National Ordinance extending the duration of the sanction decisions;

3.14. Sanction decision Yemen;

3.15. Sanctions Decree Democratic People's Republic of Korea;

3.16. Sanction decision Libya;

3.17. 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);

3.18. National Ordinance on the Obligation to report Cross-border Money Transportation;

3.19. National Ordinance Identification for Services;

3.20. National Decree providing for general measures, of 8th August 2011, for the implementation of articles 1, first paragraph, subsection b, under 16°, 6, subsection d, under 12° and 11, second paragraph, of the National Ordinance on the Identification of Customers when Providing Services (National Decree designating services, data and supervisors under the National Ordinance on the Identification of Customers when Providing Services).

4. OUR OBLIGATIONS

4.1. Omega Entertainment N.V. must designate compliance officers who will be responsible for organizing the implementation of money laundering and/or terrorist financing prevention measures as specified in the Money Laundering Regulation (see Article 3) and for liaising with the Financial Intelligence Unit (FIU) Curaçao.

4.2. Only a person who has the education, professional suitability, the abilities, personal qualities, experience and impeccable reputation required for performance of the duties of a compliance officer may be appointed as a compliance officer.

4.3. Compliance officers' obligations include but are not limited to:

4.3.1. establishment of appropriate internal control procedures with the purpose of prevention of monetary operations and transactions related to money laundering and/or terrorist financing: customer and beneficial owner due diligence, submission of reports and information to the Financial Intelligence Unit Curaçao, storage of information according to Money Laundering Regulation, risk assessment, risk management (taking into account the type of product, service or transaction, geographical risk, etc.), compliance management and communication;

4.3.2. undertaking of appropriate measures so that their relevant employees are aware at all times of the provisions currently in force on the basis of the article 3 of this procedure. Such measures shall include participation of the relevant employees in special ongoing training programs to help them recognize operations which may be related to money laundering and/or terrorist financing and provision of instruction to said employees as to how to proceed in such cases;

4.3.3. controlling overall compliance policy for prevention of money laundering and/or terrorist financing and ensuring adequate resources are provided for the proper training of staff and the implementation of risk systems. This includes computer software to assist in oversight;

4.3.4. keeping copies of all training materials. Updated AML training is given annually at minimum plus additional training when the need arises, for example in the case of significant changes in the Legislation. Records must be retained of all training sessions including dates, personnel, who received training (name, surname, functions in the company, their signatures), compliance officer who trained staff (name, surname, functions in the company, their signatures);

4.3.5. monitoring all amendments in the Legislation aimed at prevention money laundering and/or terrorist financing and updating internal instructions according to up to date information. The internal instructions must to be updated at least once a year.

5. CUSTOMER'S RISK ASSESSMENT

5.1. For the purpose of identification, assessment and analysis of risks of money laundering and terrorist financing related to their activities, Omega Entertainment N.V. prepares a risk assessment, taking account of at least the following risk categories:

- 5.1.1. risks relating to customers;
- 5.1.2. risks relating to countries, geographic areas or jurisdictions;
- 5.1.3. risks relating to products, services or transactions;

5.1.4 risk relating to communication, mediation or products, services, transactions or delivery channels between Omega Entertainment N.V. and customers.

5.2. The steps taken to identify, assess and analyze risks must be proportionate to the nature, size and level of complexity of the economic and professional activities of Omega Entertainment N.V.

5.3. As a result of the risk assessment, Omega Entertainment N.V. establishes:

- 5.3.1. fields of lower and higher risk of money laundering and terrorist financing;
- 5.3.2. the risk appetite, including the volume and scope of products and services provided in the course of business activities;

5.3.3. the risk management model in order to mitigate identified risks.

6. CUSTOMER DUE DILIGENCE

6.1. The employee of Omega Entertainment N.V. applies due diligence measures towards the customer:

- 6.1.1. if the value of the customer's transactions in a calendar month exceeds 1000 euro or an equivalent amount in another currency, regardless of whether the financial obligation is executed in a transaction in one payment or several interconnected payments, unless otherwise provided by law;
- 6.1.2. when there are doubts about the veracity or authenticity of the previously obtained identification data of the customer;
- 6.1.3. in any other case, when there are suspicions that the act of money laundering and/or terrorist financing is, has been or will be carried out.

6.2. There are following due diligence measures applicable:

- 6.2.1. identification and verification of the identity of the customer (as set forth in paragraph 7.);
- 6.2.2. receiving and verifying the information about the residential address of the customer;

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6.2.3. continuous monitoring of the customer account activity, including tracking transactions conducted during a relationship, regular checking of the data used to identify the person, updating relevant documents, data, and information, and, if necessary, identifying the source and origin of the funds used in the transaction.

6.3. Omega Entertainment N.V. employees shall be prohibited from establishing or continuing any relationships and carrying out transactions when it is not possible to fulfil the due diligence requirements established in this procedure:

6.3.1 where, in the cases established by this procedure, the customer fails to submit the data confirming his identity and his residential address, or where he submits incomplete data;

6.3.2 where the data are incorrect, or where the customer avoids submitting the information required for establishing his identity or the submitted data are insufficient for that purpose.

6.4 Omega Entertainment N.V. shall be prohibited from establishing or continue any relationships without requesting the customer to submit data confirming his identity as per section 6.1, or where there is a substantiated suspicion that the data recorded in these documents are false or falsified.

6.5. In the period of cooperation with the customer Omega Entertainment N.V. must in all cases:

6.5.1. carry out the ongoing monitoring of the customer's activity on his account, used payment methods for refilling his balance and withdrawal transactions, including scrutiny of transactions undertaken throughout the course of such relationships, to ensure that the transactions being conducted are consistent with Omega Entertainment N.V.'s knowledge of the customer, risk profile as well as the source of funds;

6.5.2. to ensuring that the documents, data or information submitted by the customer during due diligence are appropriate, relevant, regularly reviewed and kept up-to-date.

6.6. Omega Entertainment N.V. may, in accordance with internal policies and internal control procedures, refuse to execute the monetary operations or transactions and terminate the transactions or relationship with the customer, where the customer avoids submitting, or refuses to submit, additional information to a company, at its request and within the specified time limits.

6.7. For verification of payment methods used by the players to add funds to their accounts Omega Entertainment N.V. may ask:

6.7.1. photo of a credit card(s) used to make the deposit (the front side with the first 6 digits and the 4 last digits, the expiry date, and the name of the card owner all visible, rear side with the CVV covered);

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- 6.7.2. bank statement of the account from which the deposit was made for a period of the last 6 months displaying the name of the account holder;
- 6.7.3. a screenshot from the personal account of the customer in the payment system displaying the transfer of the funds in favor of Omega Entertainment N.V. (in case when e-wallet is used for making deposits);
- 6.7.4. if the customer's preferred method of adding the funds to his account is through his e-wallet (as a mentioned in the subsection 6.7.3.), where funds can be added only by wire transfer or credit card, Omega Entertainment N.V. may additionally ask to provide an account statement of the credit institution confirming the origin of the deposit.
- 6.7.5. if the customer is adding funds to his account using payment method mentioned in the subsection 6.7.3., where funds can be added by other payment methods which are not mentioned in subsection 6.7.4., Omega Entertainment N.V. may ask to prove of the legitimacy of funds used for the deposit.
- 6.7.6. Omega Entertainment N.V. may ask for a screenshot from a personal e-wallet account to confirm the name of the account holder.

7. IDENTIFICATION

- 7.1. Omega Entertainment N.V. identifies the customer and retains the following data on the prior to the account opening:
 - 7.1.1. first name, surname;
 - 7.1.2. personal identification code or, in the absence of a personal identification code, date of birth, place of birth, and
 - 7.1.3. a residential address.
- 7.2. Omega Entertainment N.V. verifies the identification data specified in clauses 7.1.1. and 7.1.2 based on a valid official identity document which includes a photograph of the holder:
 - 7.2.1. a driving license;
 - 7.2.2. an identity card;
 - 7.2.3. a travel-document or passport;
 - 7.2.4. any other document designated by the Ministry of Finance;
- 7.3. The verification of the residential address may be carried out based on the following documents:
 - 7.3.1. valid official identity document;
 - 7.3.2. a recent utility bill;
 - 7.3.3. a recent account statement or reference letter issued by a credit institution/financial institution;

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7.3.4. correspondence from a central or local government authority, department or agency

7.3.5. any other documents issued by independent agency;

7.4. In case the employees of Omega Entertainment N.V. have suspicions about the customer's identity document specified in section 7.2., they may ask to provide the copy of the identity document authenticated by a notary or certified by a notary.

8. REPORTING OF UNUSUAL MONETARY OPERATIONS OR TRANSACTIONS

8.1. Omega Entertainment N.V. must pay attention to any activity which they regard as likely, by its nature, to be related to money laundering and/or terrorist financing, and in particular to complex or unusually large transactions, and all unusual patterns of transactions which have no apparent economic or visible lawful purpose, and any relationships or monetary operations with customers from third countries in which, based on the information officially published by international intergovernmental organizations, money laundering and/or terrorist financing prevention measures are insufficient or do not correspond to international standards. Omega Entertainment N.V. must examine the basis for and purpose of execution of such operations or transactions and the results of the investigation must be recorded in writing.

8.2. Omega Entertainment N.V. must report to the Financial Intelligence Unit Curaçao any suspicious or unusual monetary operations or transactions.

8.3. Suspicious or unusual monetary operations or transactions, including:

8.3.1. cases where it is aware of, obtains information concerning, has suspicions or has substantial grounds to suspect that money laundering and/or terrorist financing was, is, or will be performed, or it has been attempted;

8.3.2. cases where they have a suspicion or sufficient grounds to suspect that the customer's funds have been obtained from criminal activity;

8.3.3. cases where they have a suspicion or sufficient grounds to suspect that the transactions or activities are related to terrorist financing;

8.4. There are indicators for helping to identify unusual transactions.

Indicators describe when a transaction (executed or intended) is to be labeled as unusual, and thus should be reported to the Financial Intelligence Unit Curaçao.

8.5. There are two kinds of indicators: objective and subjective:

8.5.1. in case of an objective indicator (see the Annex 1), it describes mandatory under which circumstances a transaction is to be considered as unusual;

8.5.2. in case of a subjective indicator (see the Annex 1), the transaction is considered unusual if the reporting entity (based on its knowledge of its clients, their income and their business activities, and any other circumstance that may be relevant) has reasonable indications to

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presume that a transaction is related to money laundering or terrorism financing. For subjective indicators, red flags can be suggested by the supervisors and/or the FIU Curaçao that indicate such possible presumptions.

8.6. Omega Entertainment N.V. must report about unusual monetary operations or transactions mentioned in section 8.3. without delay to the Financial Intelligence Unit Curaçao.

8.7. The term "without delay" is interpreted as follows:

8.7.1. Omega Entertainment N.V. should send their unusual transaction reports within 48 hours after the transaction has been executed, or after there has been an intention of a transaction.

8.7.1.1. In individual cases the reporting to Financial Intelligence Unit Curaçao might be extended to a maximum of 5 working days. A request for extended reporting should be directed in writing to the Financial Intelligence Unit Curaçao, stating the reasons for the extension.

8.7.1.2. The Financial Intelligence Unit Curaçao will inform the respective reporting entity in writing of its decision within 24 hours.

8.7.2. The time period between the execution of the transaction (or the intention to execute a transaction) and the moment the Compliance Officer receives the report, should not exceed 24 hours.

8.7.2.1. As of the moment that the Compliance Officer receives the transaction report, the Compliance Officer has to complete the relevant research with regard to a possible Money Laundering/Terrorism Financing within 10 working days.

8.7.2.2. If after the research period (maximum of 10 working days), there is a suspicion of Money Laundering/Terrorism Financing, the Compliance Officer must report the transaction within 48 hours to the Financial Intelligence Unit.

8.7.2.3. In the case it is not possible to comply with the above-mentioned time periods, the reporting entity shall send a request for reporting extension in writing to the Financial Intelligence Unit Curaçao, stating the reasons for this extension.

8.7.2.4. The Financial Intelligence Unit Curaçao will evaluate objective grounds and inform the reporting entity on its decision in writing within 48 hours upon receiving the request.

8.8. A report is submitted via the online form by accessing the MOT Portal in order to connect to the new reporting system CORSYS (link to CORSYS - <https://portal.mot.cw/portal.html>).

8.9. Prior to reporting, Omega Entertainment N.V. (that is not yet registered) is required to register with the Financial Intelligence Unit Analysis department (registration form - <http://mot.cw/Web/MOTWeb/MOTWeb.nsf/pages/EF80920031A21F9604257822004E9374?Opendocument>)

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8.10. The structural unit of Omega Entertainment N.V., a member of a management body and an

employee are prohibited to inform a person about a report submitted on them to the Financial Intelligence Unit, a plan to submit such a report or the occurrence of reporting as well as about any precept made by the Financial Intelligence Unit or about the commencement of criminal proceedings.

8.11. The prohibition provided for in section 8.10. is not applied upon submission of information to competent supervisory authorities and law enforcement agencies;

8.12. Omega Entertainment N.V. shall establish a system of measures ensuring that the employees and representatives of the entity reporting of a suspicion of money laundering or terrorist financing to the Financial Intelligence Unit are protected from being exposed to threats or hostile action by other employees, management body members or customers of Omega Entertainment N.V., in particular from adverse or discriminatory employment actions.

9. STORAGE OF INFORMATION

9.1. Omega Entertainment N.V. must keep a register of reports of unusual monetary operations and transactions specified in section 8.3. of this procedure.

9.2. Omega Entertainment N.V. must keep a register of the customers with whom transactions or relationships were terminated under the circumstances specified in section 6.6. of this procedure or under any other circumstances related to violations of the procedure for the prevention of money laundering and/or terrorist financing.

9.3. Register data shall be stored in paper or electronic format for five years from the date of termination of transactions or relationships with the customer.

9.4. Copies of the identity documents of the customer, other data received at the time of establishing the identity of the customer must be stored for five years from the date of termination of transactions or relationships with the customer.

9.5. The correspondence with the customer must be stored in paper or electronic form for five years from the date of termination of transactions or relationships with the customer.

9.6. Time limits for storage may be additionally extended upon receipt of a reasonable request from a competent institution.

9.9. Omega Entertainment N.V. must store the personal data of staff referred to in section 10.4. of this procedure for five years upon termination of employment.

10. TRAINING

10.1. In providing the specified categories of employees with the AML/CTF training, Omega Entertainment N.V. shall take into consideration the knowledge and qualifications necessary for the duties, responsibilities and authorization of staff. Omega Entertainment N.V. shall, within the framework of the training, explain to staff the AML/CTF requirements and provide detailed information on the measures and activities the staff are expected to conduct within the framework of their responsibilities.

10.2. Omega Entertainment N.V. shall develop and document a staff training plan which contains at least the following programs:

10.2.1. an internal training program for staff, which uses internal training resources (hereinafter referred to as the “internal training”);

10.2.2. an external training program for staff, which uses external training resources, including participation of foreign experts (a qualified person in the AML/CTF area) (hereinafter referred to as the “external training”);

10.2.3. a training program for new employees (employees who have just started to perform their duties, or changed position at Omega Entertainment N.V. (hereinafter referred to as the “new staff training”).

10.3. In addition to the internal training program referred to in subsection 10.2.1. of the present Regulations, Omega Entertainment N.V. shall ensure extraordinary staff training in the cases referred to in section 10.6. of this procedure.

10.4. Omega Entertainment N.V. shall ensure that the information on the conducted staff training is saved by documenting the following data:

10.4.1. name of the training;

10.4.2. personal data of the trained employee;

10.4.3. position and structural unit of the trained employee;

10.4.4. training venue;

10.4.5. head and organizer of the training;

10.4.6. time of training;

10.4.7. duration of the training;

10.4.8. result of knowledge tests and certificate obtained, if any.

10.5. Omega Entertainment N.V. shall ensure that, in addition to the internal and external training, any employee may obtain the necessary advice from senior employees involved in the AML/CTF risk management.

10.6. In addition to the internal training, Omega Entertainment N.V. shall ensure extraordinary staff training in AML/CTF issues at least in the following cases:

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10.6.1. new internal and external regulations governing the AML/CTF have come into force and are applicable to the staff of Omega Entertainment N.V;

10.6.2. new services have been introduced which cause changes in the AML/CTF risk exposure;

10.6.3. during performance of his/her duties an employee violates the internal and external regulations governing the AML/CTF due to insufficient knowledge.

Annex 1

PROVIDERS OF INTERNET GAMING AND GAMBLING

Objective indicators

<i>A. A transaction which is reported to the police or judicial authorities</i>	
Indicator	Definition
G0000111	A transaction which is reported to the police or judicial authorities in connection with money laundering or the financing or terrorism.
<i>B. An intended transaction carried out by or for the benefit of a natural person, legal person, group or entity which is on a list compiled by virtue of the Sanctions National Ordinance.</i>	
G0000114	An intended transaction carried out by or for the benefit of a person, legal person, group or entity that is mentioned on a list compiled in pursuance of the Sanctions National Ordinance.
<i>C. A transaction amounting to NAF (ANG) 5,000.00 or more, regardless whether this transaction is carried out in cash, via a check or another payment instrument or electronically or in any other non-physical manner;</i>	
<i>This comprises in any case the following situations:</i>	
G0000135	1. A giro-based transaction amounting to NAF (ANG) 5,000.00 or more:
	A giro-based transaction is a transfer from a bank account of the service provider to a local or international bank account carried out at the request of the client addressed to the service provider.
	2. The taking into deposit or the releasing out of deposit of an amount of NAF(ANG) 5,000.00 or more, at the request of the client.
	3. Sale of tokens to a client in the amount of NAF (ANG) 5,000.00 or more.
	The term "tokens" includes at least chips and credits.
	4. Pay-out of prizes in the amount of NAF (ANG) 5.000,-- or more.
	5. All other cases.
NB In case of Indicator G0000135: please also indicate the applicable sub-indicator (1,2,3,4 or 5) when reporting a transaction. In case of sub-indicator 5, please always provide a description of the situation.	

Subjective indicator

<i>Suspected money laundering transactions or financing of terrorism.</i>	
Indicator	Definition
G0000211	A transaction giving cause to assume that it may be connected with money laundering or terrorist financing.

The following applies for all indicators in these annexes:

- for all amounts mentioned in NAF (ANG): this encompasses both the amount in NAF (ANG) as well as the equivalent thereof in foreign currency;
- the transaction concept encompasses both realized and intended transactions¹.

¹ It is necessary, for an extensive explanation of the foregoing, to peruse the official explanation pertaining to this Decree.