

**Customer
Acceptance Policy**

CARRER N.V.

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February 2025

Document Information

Subject	Customer Acceptance Policy
Purpose	Comany's policy for acceptance of customers
Involvements	All departments
Responsibility	MLRO
Approval	Director
Review	Annually or earlier as needed
Classification	Company Confidential

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1. Introduction

Based on the requirements of various statutory obligations, including Applicable Laws (as it described below), Carrer N.V. ("the Company") has taken a position on who they can and cannot accept as a customer.

In general, the Company would not like to turn away genuine customers as the business requires acceptance of as many customers as possible to generate revenues.

However, due to various local and international laws and regulations, not all customers willing to have an account with the Company are able to do so.

2. Customer Acceptance Policy

The Company does not open accounts or deal with customers of unknown identity or who have fictitious or unreal names.

The Company will only accept customers who are at least eighteen years old or have reached the age of maturity as established in the customer's country of residence, whichever is the highest.

The Company shall only accept customers with intentions to avail themselves of remote gaming services and shall not establish relationships with individual persons who would not have such intentions.

The Company will identify and verify the customer's identity and origin in accordance with the Applicable Laws and the Customer Due Diligence Procedure. The Company will also meet the requirements emanating from any other applicable laws and regulations within the timeframes set within, where applicable.

The Company will not allow any registration or activity from customers who utilise any technological measure to misrepresent or obfuscate their geographical location or origin.

The Company shall not accept customers acting on behalf of third parties and may terminate the business relationship if at any time the Company has reason to believe that a customer's account is being used by third parties.

Persons who originate from countries that are considered as being a High Risk of Money Laundering, Financing Terrorism and Proliferation of Weapons of Mass Destruction activities, as regularly highlighted by the Financial Action Task Force ("FATF") or sanctioned countries as identified in the several sanction lists shall not be accepted as customers of the Company. Generally such list of countries may include:

- countries on the FATF list of High - Risk Jurisdictions subject to a Call for Action;
- countries on the FATF list of Jurisdictions under Increased Monitoring;
- countries on the CFATF Public Statement;
- countries identified as Jurisdictions of Concern or Primary Concern in the U.S. Department of State's annual International Narcotics Control Strategy Report (INCSR);
- countries on the European Commission's list of third countries having strategic deficiencies in their AML/CFT regime;
- countries sanctioned by the OFAC;
- countries identified by credible sources as providing funding or support for terrorist activities or have terrorist organizations operating within them;
- countries on the Corruption Perception Index compiled by Transparency International.

Individuals whose name is included in any Financial Sanction Lists compiled by the United Nations and/or the European Union shall not be accepted as customers. Individuals whose name is included into such lists after they would have been accepted

as customers will have their account closed. Ongoing checking of active customers against such lists is carried out.

Each customer who enters into a single transaction or business relationship is subject to a "Know-Your-Customer" (KYC) review.

The Company has to establish the identification and verification procedures. When identifying the customer, at a minimum the following information must be collected:

- (i) full name;
- (ii) permanent residential address;
- (iii) date of birth;
- (iv) place of birth;
- (v) nationality
- (vi) identity number.

The provided information then shall be verified by making reference to an unexpired government-issued document containing photographic evidence of the customer's identity (e.g. passport / ID card). For the verification purposes, other documents can be obtained by the Company, such as a proof of address document (utility bill), an account statement for the bank from which funds were deposited, and copies of the back and front of registered Credit Cards.

If the customer does not provide the requested documents, the Company may suspend the customer account or permanently close the account.

Politically Exposed Persons ("PEPs") shall not be accepted as customers by the Company unless specific Senior Management approval is obtained, and enhanced due diligence is carried out. Such customers shall be specifically flagged, and ongoing enhanced monitoring of the account shall be conducted.

The Company also takes reasonable measures to establish the source of wealth and the source of funds of any PEP accepted as a customer, ensuring that the PEP's spending pattern aligns with their legal source of funds. For such purposes, the Company requests a statement from the PEP regarding the source of funds and verifies it by consulting independent and reliable sources, e.g., public sources. When public sources cannot verify the information sufficiently, the Company may request additional documents from the PEP.

The Company will not enter into relationships with individuals that have been identified or suspected to have committed acts of fraud or bonus abuse with other operators. The Company will also not engage in, or continue, business relationships with individuals who are identified to have been involved, suspected of or known to be associates of individuals involved in criminal activities.

The Company will not enter into relationships with individuals who have self-excluded, temporarily or permanently or indicated in any way that they might suffer from responsible gaming issues.

Applicable Laws

National regulations:

- The Code of Criminal Law (Penal Code) (N.G. 2011, no. 48);
- The National Ordinance on the Reporting of Unusual Transactions (N.G. 2017, NO. 92) ;
- The National Ordinance on Identification of Clients when Rendering Services (N.G. 2017, no. 92) ;

- Ministerial Decree with general operations of November 11, 2015, laying down the indicators, as mentioned in article 10 of the National Ordinance on the Reporting of Unusual Transactions (Regulators Indicators Unusual Transactions) (N.G. 2015, no.73)
- 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);
- National decree for general measures, of the 10th of July 2015, for the implementation of article 2 of the Sanctions National Ordinance, containing implementation of United Nations' Security Council Resolutions concerning Al-Qaeda c.s., the Taliban of Afghanistan c.s., ISIL c.s. ANF c.s. and persons and organizations to be designated locally (N.G. 2015, no. 29);
- National Decree for general measures, of the 10th July 2015, for the implementation of article 2 of the Sanctions National Decree containing implementation of the United Nations' Security Council resolutions concerning Libya (Sanctions Ordinance Libya) (N.G. 2015 no. 28);
- National Decree for general measures, of the 10th of July 2015, for the implementation of article 2 of the Sanctions National Ordinance, containing implementation of Resolutions 1695 (2006), 2087 (2013) and 2094 (2013) of the United Nations Security Council (Sanctions Decree People's Democratic Republic of Korea 2015) (N.G. 2015 no.30);
- National Ordinance extension of validity sanctions decrees 2018 (N.G. 2018, no.34)

These laws and decrees serve as the basis for the procedures maintained by the financial sector of Curaçao to detect and deter industry related risks for money laundering, the financing of terrorism or other criminal activities and form the main legal basis for the Gaming Sector to combat money laundering, the financing of terrorism and the proliferation of weapons.

International regulations:

- Caribbean Financial Action Task Force regulations www.cfatf-gafic.org.
- FATF regulations – www.fatf-gafi.org – High-risk and other monitored jurisdictions (published on FATF Website and updated regularly).
- United Nations - Financial Sanctions Consolidated List.
- European Union – Consolidated list of sanctions, AML/CFT Information page.

Approved by
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 Solutions for Management and
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 Managing director



Date: 23.04.2025