

Anti-Money Laundering (AML) and Know Your Customer (KYC) Policy Carletta N.V.

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Introduction

Carletta N.V. is committed to ensuring the highest standards of security, transparency, and integrity in all aspects of its operations. As a licensed online gaming operator under the laws of Curaçao, we apply strict Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) controls to protect our players (hereinafter also “users”, “customers”) and ensure full compliance with the applicable laws, including but not limited to:

- The AML/CFT Regulations issued by the Curaçao Gaming Authority (CGA);
- The National Ordinance on the Reporting of Unusual Transactions (NORUT);
- The National Ordinance on Identification when Rendering Services (NOIS);
- The Kingdom Sanctions Act (Rijkssanctiewet);
- The Sanctions National Ordinance;
- The FATF 40 Recommendations.

This policy outlines how Carletta N.V. ensures that only verified, legitimate users engage with our platform, and how we protect the integrity of our services.

Purpose of the Policy

This Policy is designed to support Carletta N.V.’s compliance with applicable AML/CFT obligations and to ensure the integrity of its gaming platform. Specifically, it aims to:

- Prevent misuse of the platform for illegal financial activity such as money laundering, terrorist financing, or the funding of weapons proliferation;
- Ensure that all funds used by players originate from lawful sources and are used in accordance with applicable laws and platform rules;
- Apply risk-based customer verification and due diligence procedures that are proportionate to the level of risk posed by each player;
- Comply with the AML/CFT regulatory framework of Curaçao, including the AML/CFT Regulations, NORUT, NOIS, and international standards such as the FATF Recommendations;
- Protect Carletta N.V.’s players, systems, and reputation by detecting and reducing the risk of fraud, abuse, and financial crime.

Definitions:

Money Laundering and Terrorist Financing or ML/TF/FP: Means the money laundering offenses and terrorist financing offenses defined in the Law.

Terrorist Financing (TF): The process of providing funds for terrorist activity, whether or not the source of the funds is lawful.

Know Your Customer (KYC): The process of identifying and verifying a customer's identity before or during the establishment of a business relationship. KYC includes collecting personal data, verifying documents, screening for sanctions and PEPs, and understanding the nature of the customer's intended activity.

Customer Due Diligence (CDD): The procedures used to identify and verify customers, assess their risk profile, and ensure compliance with applicable regulations.

Politically Exposed Person (PEP): An individual who holds or has held a prominent public function, as well as their close associates and family members.

Sanctions Screening: The process of checking customers against relevant national and international sanctions lists (UN, EU, OFAC, etc.).

FIU: The Financial Intelligence Unit Curaçao, responsible for receiving and analyzing unusual transaction reports.

Who Does This Policy Apply To?

This Policy applies to:

- All players registering on our platform;
- Any player making deposits or withdrawals;
- All operational, customer-facing, and KYC-related staff;
- Third-party KYC, risk, or payment providers acting on behalf of Carletta N.V.

Age and Jurisdiction Restrictions

Carletta N.V. is committed to operating in accordance with applicable age and jurisdictional access controls as required by Curaçao AML/CFT regulations and best international practices. Specifically:

Minimum Age Requirement:

Access to the platform is strictly limited to individuals aged 18 years or older. During the registration and verification process, Carletta N.V. collects and validates the player's date of birth and supporting documentation to confirm eligibility. Accounts found to belong to underage users are terminated, and any associated balances may be forfeited.

Prohibited Jurisdictions:

Players residing in or accessing the platform from certain high-risk or restricted jurisdictions are not permitted to use our services. This includes countries:

- Subject to comprehensive international sanctions (UN, EU, OFAC);

- Designated by the FATF as “high-risk jurisdictions subject to a call for action”;
- Prohibited under the regulatory framework of the Curaçao Gaming Authority (CGA);
- Explicitly listed in Carletta N.V.’s internal Prohibited Countries List.

Technical Access Controls:

Carletta N.V. implements measures to restrict access from prohibited countries, including:

- Geo-IP blocking;
- VPN/proxy detection technologies;
- Restrictions on payment methods linked to unsupported jurisdictions.

These controls are reviewed and updated regularly. Players who attempt to bypass restrictions may have their account limited or closed in accordance with this Policy.

Account Registration

To register and operate a player account with Carletta N.V., users must complete the full onboarding process by providing the following information:

- Full legal name;
- Date and place of birth;
- Permanent residential address;
- Nationality;
- Valid and accessible email address;
- Mobile phone number;
- Identity reference number (if applicable);
- Preferred account currency and secure password.

After submitting the registration form, the player will receive a verification email containing an activation link. Access to the gaming platform, including the ability to deposit funds and place bets, is granted only after successful email verification.

Carletta N.V. reserves the right to request supporting documentation to confirm the accuracy of the information provided during registration. Any discrepancies may result in account restrictions or refusal to onboard the user.

Know Your Customer (KYC) and Identity Verification

Carletta N.V. applies Know Your Customer (KYC) procedures in accordance with Curaçao AML/CFT Regulations to verify the identity of its players and ensure compliance with legal obligations.

Verification may also be requested at any time at the discretion of Carletta N.V. to ensure the ongoing integrity of the player’s profile.

Only verified players may access the full range of account functionality, including financial transactions. Failure to complete KYC may result in restricted access or account suspension.

Required Documents:

To complete identity verification, players must submit the following documents in accordance with Curaçao AML/CFT Regulations:

1. Proof of Identity

A clear, color image or scan of one of the following government-issued photo IDs:

- Passport (photo page)
- National identity card (front and back)
- Driver's license (front and back)
- Residency Card (where applicable).

In addition, a selfie or a photo of the player holding the submitted document next to their face is required to confirm its authenticity and to ensure that it belongs to the person initiating the account. The photo must clearly show the player's entire face and the document without glare, blur, or obstructions.

2. Proof of Residential Address

A document issued within the last six (6) months showing the player's full name and residential address. Accepted documents include:

- Utility bill (e.g., electricity, water, gas)
- Bank statement
- Lease Agreement

3. Document Standards

All documents must:

- Be submitted in color (black-and-white scans will not be accepted)
- Be clearly legible and unaltered
- Show all edges and corners
- Be free from glare, blur, or obstructions

4. Additional Documentation

Carletta N.V. reserves the right to request further information at any time, including:

- Proof of ownership of payment methods used
- Source of Funds (SoF) or Source of Wealth (SoW) documentation
- Notarized or certified copies of documents, if necessary for compliance purposes

Failure to provide complete and acceptable documentation may result in delayed verification or account restrictions.

Verification of Payment Methods

To ensure transparency, ownership, and lawful use of funds, Carletta N.V. requires that all financial transactions on the platform comply with the following rules:

- **Personal Use Only:**

Players must use payment instruments (e.g., bank accounts, credit/debit cards) that are registered in their own name. Use of third-party or shared accounts is strictly prohibited.

- **Deposit and Withdrawal Matching:**

Where technically feasible, withdrawals must be made to the same payment method used for deposits. If this is not possible, the alternative method must also be verified and confirmed to be owned by the player.

- **Cash Transactions Prohibited:**

Carletta N.V. does not accept or disburse funds in physical cash. All deposits and withdrawals must be made through online, traceable financial channels.

- **Documentation Requirements:**

The Company may request supporting documents to confirm payment method ownership.

Failure to comply with payment verification procedures may result in transaction denial, account restrictions, or suspension until verification is successfully completed.

Customer Due Diligence (CDD)

Carletta N.V. applies a risk-based Customer Due Diligence (CDD) process to verify the identity and legitimacy of all players. The level of due diligence depends on the nature and scope of the player's activity, and is proportionate to the assessed risk profile.

All players are subject to ongoing monitoring, and their risk classification may be updated over time. Carletta N.V. reserves the right to request further information or documentation at any stage of the relationship.

Politically Exposed Persons (PEPs)

Carletta N.V. identifies and assesses whether a player qualifies as a Politically Exposed Person (PEP) or is closely associated with a PEP in accordance with Curaçao AML/CFT requirements.

Players identified as PEPs are subject to additional due diligence measures, in line with regulatory expectations. These may include:

- Enhanced verification procedures;
- Senior management involvement in onboarding decisions;
- Periodic review of the business relationship.

Carletta N.V. monitors PEP status on an ongoing basis and applies controls to ensure that the relationship remains within the Company's risk tolerance and legal obligations.

Re-verification and Monitoring

Carletta N.V. maintains the right to request updated or additional documentation from players in support of ongoing verification obligations.

Until requested documents are reviewed and approved, access to certain account features — including deposits, withdrawals, or gameplay — may be temporarily limited.

This approach ensures that all player information remains accurate and up to date and supports our ongoing AML/CFT obligations.

Ongoing Monitoring

Carletta N.V. performs ongoing monitoring of all player accounts throughout the business relationship to ensure compliance with AML/CFT obligations.

Monitoring activities include:

- Periodic reviews of player-provided documentation to confirm it remains current;
- Reassessment of player risk levels based on updated behavior, transactional patterns, or jurisdictional exposure;
- Re-verification where changes in risk, profile, or regulatory expectations justify it.

These measures help ensure that all customer data remains accurate, risk classifications are up to date, and due diligence obligations are met continuously.

Transaction Monitoring

Carletta N.V. maintains a robust transaction monitoring system combining automated tools and manual oversight to detect activity that may be inconsistent with the player's profile or platform policies.

All monitoring is conducted in accordance with Curaçao AML/CFT obligations and is aligned with industry best practices to ensure early detection of potential financial risks.

Sanctions Compliance

Carletta N.V. performs mandatory sanctions screening on all players in accordance with Curaçao AML/CFT law and international obligations. Players are screened against global watchlists, including but not limited to:

- United Nations Security Council (UNSC);
- European Union (EU);
- U.S. Office of Foreign Assets Control (OFAC);
- Other relevant regional or national authorities.

If a player is found to be sanctioned or associated with a sanctioned individual or entity, the account may be blocked or restricted as required by law.

Carletta N.V. also ensures proper data retention in compliance with applicable AML legislation. This includes:

- Identification and verification records;
- Submitted KYC documentation;
- Records of transactions and compliance-related communications.

All records are stored securely and retained for minimum of 5 years following the termination of the business relationship or up to 10 years if required by FIU or legal process.

Tailoring and Continuous Improvement

Carletta N.V. maintains a dynamic and adaptive AML/CTF compliance framework that is regularly reviewed to ensure ongoing alignment with:

- Legislative and regulatory developments in Curaçao and internationally;
- Operational changes, new products, technologies, or customer behaviors;
- Emerging risks identified through external sources (e.g., FATF, FIU guidance);
- Findings from internal reviews, compliance audits, and feedback from senior management.

The AML and KYC Policy, related procedures, and control mechanisms are reviewed at least annually, or more frequently when triggered by a material change in risk or regulatory expectations.

This proactive approach ensures that the Company's controls remain effective, risk-proportionate, and responsive to the evolving AML/CFT landscape.

Sanctions for Non-Compliance

Carletta N.V. enforces a strict compliance regime in line with Curaçao AML/CFT regulations. Any failure by a player to comply with verification, due diligence, or AML/CFT-related obligations may result in corrective or enforcement action, including:

- Temporary or permanent suspension of the player's account;

- Blocking of withdrawals and denial of further access to services;
- Termination of the business relationship;
- Submission of a report to the Financial Intelligence Unit (FIU) of Curaçao or other competent authority;
- Other legal, regulatory, or administrative measures as may be applicable under Curaçao law.

The Company reserves the right to take such actions at its sole discretion where it deems necessary to ensure compliance with legal obligations and to protect the integrity of its platform.

Payout Management

Carletta N.V. processes withdrawals in accordance with regulatory requirements and internal AML/CFT controls. To ensure the legitimacy of outgoing transactions, the following conditions apply:

- Withdrawals will only be processed after the player's identity and payment method ownership have been successfully verified;
- Payouts must be returned to the same source used for deposit, where technically feasible;
- Any wagering or promotional requirements must be fully satisfied prior to withdrawal (if applicable);
- Deposited funds must be used for genuine gaming activity and not for purposes inconsistent with the platform's fair use policy.

The Company reserves the right to delay or deny payout requests if verification is incomplete, discrepancies are identified, or additional information is required. Withdrawals to third-party or unverified accounts are not permitted under any circumstances.

Player Responsibilities

To maintain a compliant and secure environment, all players of Carletta N.V. are expected to observe the following responsibilities:

- Provide complete, accurate, and up-to-date personal and contact information during registration and throughout the account lifecycle;
- Use only their own identity and financial instruments to access and transact on the platform;
- Respond promptly to any verification or information requests issued by the Company;
- Maintain only one registered account per person and refrain from creating duplicate or secondary accounts;

- Refrain from any attempt to bypass verification, deposit, or bonus restrictions through multi-accounting or misuse of credentials.

Carletta N.V. reserves the right to take corrective measures, including account suspension or closure, reversal of bonuses or winnings, and other limitations, in line with its Terms and Conditions and AML/CFT compliance obligations.

Customer Communication

We believe in maintaining open communication and transparency with our players regarding verification procedures. Carletta N.V.:

- Notifies players in a timely manner when verification is required;
- Provides clear guidance on required documentation and submission formats;
- Offers assistance through customer support for all compliance-related queries.

Players are encouraged to cooperate proactively and reach out with any questions or concerns regarding verification.

Data Protection and Confidentiality

Carletta N.V. ensures the integrity and security of all sensitive information related to AML/CTF compliance.

1. Encryption and Secure Storage:

Client information, including KYC records and transaction logs, is encrypted and securely stored in compliance with data protection regulations.

2. Access Control:

Access to compliance-related information is restricted to authorized personnel only.

3. Incident Management:

The Company has incident response plan, ensuring rapid resolution of data breaches and regulatory notification, if required.

Cooperation with Authorities

Carletta N.V. fully cooperates with the Financial Intelligence Unit (FIU) Curaçao and all other competent regulatory, law enforcement, or supervisory authorities in accordance with its legal obligations.

In the event of a lawful request, the Company may provide access to or disclose relevant information, including but not limited to:

- Know Your Customer (KYC) documentation;
- Transaction records and account activity;
- Risk assessments and monitoring logs;
- Internal compliance communications or findings.

Such cooperation is conducted in full compliance with applicable laws and with due regard to confidentiality and data protection standards.

Role of the Compliance Officer

Carletta N.V. has appointed a qualified Compliance Officer responsible for the implementation and oversight of the Company's AML/CFT program.

Key responsibilities include:

- Ensuring day-to-day compliance with applicable AML/CFT regulations;
- Overseeing customer due diligence, transaction monitoring, and internal reporting procedures;
- Acting as the primary liaison with the Financial Intelligence Unit (FIU) and other competent authorities;
- Conducting compliance training and ongoing risk assessments.

The Compliance Officer operates independently of the operational teams and reports directly to the Company's senior management. The position is granted full access to all relevant customer and transactional data required to fulfil these duties.

Support and Contact

For questions regarding identity verification, account status, or compliance with AML/CFT requirements, players may contact the Support Team at **email:** support@pin-up.support.

All inquiries will be handled confidentially and in accordance with applicable privacy and data protection laws.

Carletta N.V. is committed to fair play, regulatory compliance, and safeguarding the integrity of its gaming environment.



(SMES) Solutions for Management and Employment Support N.V.

Managing Director

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