



# Anti-Money Laundering Policy for Western Way Tech

|                              |                    |
|------------------------------|--------------------|
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| <b>Reviewed by</b>           | Board Member       |
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## Table of Contents

|                                                                             |           |
|-----------------------------------------------------------------------------|-----------|
| <b>1. Compliance Statement.....</b>                                         | <b>3</b>  |
| <b>2. Regulatory Framework .....</b>                                        | <b>3</b>  |
| <b>3. General Obligations.....</b>                                          | <b>3</b>  |
| <b>4. Definition of Money Laundering and Terrorist Financing .....</b>      | <b>4</b>  |
| <b>5. Money Laundering Reporting Officer (MLRO).....</b>                    | <b>4</b>  |
| <b>6. Business Risk Assessment.....</b>                                     | <b>4</b>  |
| <b>7. Prohibited Countries .....</b>                                        | <b>5</b>  |
| <b>7. Reliance on Third Parties to Perform Customer Due Diligence .....</b> | <b>7</b>  |
| <b>8. Customer Risk Assessment.....</b>                                     | <b>7</b>  |
| <b>9. Monitoring of Suspicious Activity .....</b>                           | <b>7</b>  |
| <b>10. Enhanced Due Diligence.....</b>                                      | <b>8</b>  |
| <b>11. Politically Exposed Person and Sanctions .....</b>                   | <b>8</b>  |
| <b>12. Adverse Media .....</b>                                              | <b>8</b>  |
| <b>13. Ongoing Monitoring .....</b>                                         | <b>9</b>  |
| <b>14. Internal Controls .....</b>                                          | <b>9</b>  |
| <b>15. Reporting (Internal &amp; External) .....</b>                        | <b>10</b> |
| <b>16. Record Keeping.....</b>                                              | <b>11</b> |
| <b>17. Employee Vetting.....</b>                                            | <b>11</b> |
| <b>18. Communication and Training .....</b>                                 | <b>11</b> |
| <b>19. Risk Assessment and Compliance Management.....</b>                   | <b>11</b> |
| <b>20. Policy Distribution .....</b>                                        | <b>11</b> |
| <b>21. Due Diligence for Third Parties .....</b>                            | <b>12</b> |
| <b>22. Policy URL .....</b>                                                 | <b>12</b> |
| <b>23. Compliance and Consequences of Non-Compliance .....</b>              | <b>13</b> |
| <b>Appendix 1. References .....</b>                                         | <b>13</b> |

## 1. Compliance Statement

It is the policy of Westward Way Tech (The Company) to comply in all respects with the requirements of the Money Laundering Legislation by ensuring that we have policies and procedures to aid compliance.

The main scope of this policy is to establish the essential standards designed to prevent the Company from being used for money laundering and terrorism financing. This Anti-Money Laundering (AML) policy applies to the Company and all of its staff who provide services which might be used to conceal or disguise the true origins of criminally derived proceeds with the intention to make unlawful proceeds appear to have derived from legitimate origins or to constitute legitimate assets.

## 2. Regulatory Framework

Below is a list of all the relevant AML legislation and regulations pertaining:

- Curacao Gaming Board Regulations for AML/CFT.
- National Ordinance on Identification when rendering services (N.G 2017, no 92).
- NORUT – National Ordinance on the Reporting of Unusual Transactions (N,G 2017, no 99).
- 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).
- The Code of Criminal Law (Penal Code) N.G 2011, no 48).
- National Ordinance on Games of Chance (LOK).

## 3. General Obligations

This Policy sets out the procedures which must be followed to enable the Company to comply with its legal obligations. To give effect to this AML policy, the Company is committed to:

- Formulate and implement internal rules and develop procedures and systems to detect and monitor suspicious transactions and to report thereon to the relevant authorities.
- Ensure sufficient resources are devoted to the training of staff to increase their

awareness and ability to deal with suspicious transactions and to keep them informed of new legislative developments and requirements.

- Ensure commercial considerations never override the need to comply with the Regulations.
- Create an environment where staff who report on suspicious transactions can do so confidentially and without fear of reprisal.

#### 4. Definition of Money Laundering and Terrorist Financing

Money laundering is the process by which criminals attempt to hide and disguise the true origin and ownership of the proceeds or any other benefit of their criminal activities, thereby avoiding prosecution, conviction, and confiscation of the criminal funds. There are three stages in the process:

- Placement: Cash first enters the financial system at the "placement" stage, where the cash generated from criminal activities is converted into monetary instruments.
- Layering: How the link between the funds and the criminal is concealed.
- Integration: Investing and/or recovering the funds in a way that looks legitimate.

As it is strictly a Company policy not to accept cash as means of payment, the Company's AML Policy is focused to prevent the use of the Company's activities and resources in the 2<sup>nd</sup> and in the 3<sup>rd</sup> stage.

#### 5. Money Laundering Reporting Officer (MLRO)

The nominated Money Laundering Reporting Officer (MLRO) shall receive disclosures about any suspected money laundering or financial terrorism activity and shall be responsible for informing the Company of the AML policies and procedures. The responsibilities of the MLRO are to supervise the actions of the Company and consider the contents of any report made to him/her in relation to relevant information that is available to the Company.

#### 6. Business Risk Assessment

The company use a Business Risk Assessment to highlight key risk areas, how those risks are mitigated through the design and effective implementation of policies and procedures and support a risk-based allocation of resource to the highest risk areas, as well as the establishment of strategic (more long-term) and tactical (immediate workaround) action plans for managing the identified risks.

##### 5.1 A Business Risk Assessment is Carried out in 4 Stages:

- Determine the inherent risk.
- Assess the internal control effectiveness.
- Derive the residual risk.
- Rank residual risk according to level of importance and remediate control deficiencies.

##### 5.2 In summary, a Risk Assessment is performed to:

- Identify gaps or opportunities for improvement in AML policies, procedures, and processes.

- Make informed decisions about risk appetite and implementation of control efforts, allocation of resources, and technology spend.
- Assist management in understanding how the structure of a business unit or business line's AML compliance programme aligns with its risk profile.
- Develop risk mitigation strategies, including applicable internal controls and therefore lower a business unit or business line's residual risk exposure.
- Ensure senior management is made aware of the key risks, control gaps, and remediation efforts.
- Assist senior management with strategic decisions in relation to commercial exits and disposals.
- Ensure regulators are made aware of the key risks, control gaps, and remediation efforts across the business.
- Assist management in ensuring that resources and priorities are aligned with its risks.

The Business Risk Assessment is reviewed and updated annually, or where there are significant changes in the control or regulatory environment.

## 7. Prohibited Countries

Geographical risk assessment is conducted on all countries where the company accepts customers. The assessment will be completed using the lists below:

- FATF Jurisdictions under Increased Monitoring.
- FATF/CFATF High Risk Jurisdictions subject to a Call for Action.
- EU List identifying high-risk 3rd countries with strategic deficiencies.
- The US Department of State Money Laundering assessment (INCSR).
- Basel AML Index.

The company does not accept customers from any high-risk countries identified on the above lists, this is enforced by blocking players from playing from these countries. Enhanced due diligence will be requested on any customers who are resident from a high-risk country.

Deep Dive may initiate enhanced due diligence when the person's nationality, country of birth, or transactions are from countries identified by the FATF and the CFATF.

### 6.1 Customer Due Diligence

The company follows a risk-based approach, and the appropriate due diligence can be applied to such a customer. This means that the higher the ML/FT risk is, the greater the level of due diligence is, therefore there is a particular emphasis on higher risk customers.

### 6.2 Customer Simplified Due Diligence

The following information is obtained at onboarding stage:

- Full Name
- Residential Address
- Date of Birth
- E-mail address and Mobile Number
- Identity reference number, when available

### 6.3 Customer Due Diligence

- The Company identifies and performs verification checks on all players, as set out by the Curacao regulations.
- All customers are requested to provide due diligence upon reaching total deposits or withdrawals of 2,000 USD.
- The company terminates the business relationship with the customer when due diligence documentation is not received within 30 days from the initial request. Withdrawals should not be permitted until verification is received and approved.

### 6.4 Due Diligence Documents

- In order to verify the details on their player account, the company will request the customer to provide a copy of one document from each of the categories listed below:

### 6.5 Personal Identification

- Valid Passport
- Valid driving License
- Valid National identification Document (Picture ID)

Where any such document does not allow verification of one's residential address, the following documents will be requested.

### 6.6 Address Verification

- Utility Bill, which is less than 3 months old. Mobile phone bills are not sufficient. The bill provided must pertain to a service delivered to the address provided by the player upon registration.
- Tax Bill
- Copy of Bank Statement, which is less than 3 months old.

All documents received are vetted by employees and authenticity checks ensure the documentation is genuine and have not been tampered or are fake.

In addition to completing the registration form, the Company may carry out additional verification procedures (such as an ID card or driving license) before any payout. If necessary, the Company will do a phone verification exercise, which will involve calling the number the user has stated and verifying the information provided by the player.

### 6.7 Source of Payment Verification

- Player account registered credit or debit card (Front only copy of credit or debit card account statement of the card registered with the player account).
- A copy of a bank statement, which must have the company's transaction or the registered card number visible.

Once all the information requested is obtained, the Company sends a confirmation email to the customer on the email address provided by the customer in the registration form. In addition, to the due diligence process performed at the initial acceptance stage, the players are monitored on an ongoing basis. Internal Controls, as per section 8 provide the framework for ongoing monitoring of the players.

## 7. Reliance on Third Parties to Perform Customer Due Diligence

The company does not rely on third parties to perform CDD measures in line with the Curacao regulatory requirements, laws, and regulations.

## 8. Customer Risk Assessment

All customers are categorized based on their AML/CFT risk. The following risk factors are assessed:

- Customer Risk
- Geographical Risk
- Product Risk
- Payment Risk

Customers that are categorized as high risk are requested to provide enhanced due diligence, all customers rated as low or medium will be placed into internal monitoring.

The customer's risk rating will be reassessed when their activity is unexplained or is inconsistent with the customer's profile.

## 9. Monitoring of Suspicious Activity

The Company will monitor for suspicious activity. If any such suspicious activity is detected, additional due diligence will be performed before proceeding with the transaction. If a reasonable explanation is not determined, the suspicious activity shall be reported to the MLRO. Suspicious Activity includes but is not limited to:

- The player exhibits unusual concern regarding the terms and conditions of his/her player account, particularly with respect to his/her identity, or furnishes unusual or suspect identification or business documents.
- The customer has a questionable background or is the subject of news reports indicating possible criminal, civil, or regulatory violations.
- The player displays unusual activity such as large deposits and withdrawals, or deposits and immediate withdrawals.
- The player requests winnings to be deposited in another player's account.

The Regulations for the combating of Money Laundering, the Financing of Terrorism and Proliferation of weapons of mass destruction, state that the following transactions or intended transactions are deemed unusual

- Transactions which in connection with money laundering or terrorism financing are reported to the Police or the Department of Justice
- Transactions by or on behalf of a natural or legal person, a group or an entity, that is named on a list, adopted by virtue of the Sanctions National Ordinance (N.G. 2014 no. 55)
- Transactions in the amount of NAf. 5,000 or more, regardless of whether the transaction is made in cash, by check or other form of payment, or through electronic or other non-physical means. This includes but is not limited to:
  - A cashless transaction in the amount of NAf. 5,000 or more.
  - Accepting or releasing a deposit in the amount of NAf. 5,000 or more at the

- request of the client
- A cashless transaction is a transfer from a bank account of the casino to a local or international bank account, at the request of the client.
- Accepting or releasing a deposit in the amount of NAf. 5,000 or more at the request of the client.
- Sale to a customer of chips in the amount of NAf. 5,000 or more. "Chips" include, but is not limited to, tokens and credits.
- A cash out in the amount of NAf. 5,000 or more.

When suspicious activity is detected, the company will request enhanced due diligence documentation from the customer, in addition the member of staff will immediately report the customer to the MLRO.

## 10. Enhanced Due Diligence

The company will request the following enhanced due diligence from customers:

- Pay slip or bank statement showing salary being processed.
- Annual self-assessment tax return
- Company's financials
- Pension Plans

## 11. Politically Exposed Person and Sanctions

All customers of the company are checked against the PEP database upon reaching total deposits of 2K USD, all customers identified as a potential PEP, or on the sanction list will be reviewed by the Risk Team, and if verified, their account will be closed and the MLRO informed.

The company will rescreen customers against these databases as part of ongoing monitoring.

To comply with the United Nations Security Council resolutions and the Common Foreign and Security Policy of the European Union. Compliance with sanctions imposed by the UN Security Council is mandatory under the Charter of the United Nations. Upon notification of a sanctioned person playing on any of the sites across the company, any funds held on the gaming account with frozen and reported to the FIU immediately.

It is the reporting entity's responsibility to perform ongoing checks of its client database against the international lists of designated persons/ entities/ groups to make sure the reporting entity is not permitting/ facilitating access to funds to those mentioned on the sanctions lists. The primary sanctions list reporting entities must check against are UN, EU, USA-OFAC lists, Curacao National Lists (currently not in place), local lists of all jurisdictions where online gaming and gambling activities are provided, and/or clients are accepted.

The Sanctions Screening will be performed before the first deposit is initiated, and the rescreening may happen based on the customer's risk.

## 12. Adverse Media

All customers are checked for Adverse Media upon reaching total deposits of 2K USD, all

customers identified as having adverse media will be reviewed by the MLRO, who will decide if source of wealth/funds documents are required.

The company will rescreen customers against these databases as part of ongoing monitoring.

### **13. Ongoing Monitoring**

In accordance with Customer Due Diligence measures listed under Article 7 of the Prevention of Money Laundering and Funding Terrorism Regulations of 2003, it is the policy of this Company to undertake a risk assessment and ensure that evidence of customer's identity is obtained and retained as appropriate for all clients.

Due to the nature of the online gaming business, the Company conducts an *enhanced* due diligence process for all of its prospective customers.

### **14. Internal Controls**

Internal control procedures have been designed to comply with the regulations. Internal controls take the form of manual controls implemented on a daily basis by the Company's Operations Team (and/or Payments Team) and computer/automated controls inherent within the gaming system software.

The gaming system has inbuilt internal control tools which, based on the information input by the prospective customers, can trigger red flags about suspicious activity to the Operations Team.

#### **14.1 Prevention of Multiple Accounts Held by Same User**

Inbuilt system checks whether the email provided by the prospective customer is unique in the customer database preventing the possibility of a player having multiple accounts. If a player tries to open more than one account, for whatever reason, the Company reserves the right to block or close any or all of the player's accounts at its discretion.

#### **14.2 Detection of Any Underage Registrations**

Underage registrations are automatically not allowed by the system.

#### **14.3 No Cash, no Credit Policy**

Credit card deposits are accepted by the system only if the customer enters a valid credit card number with sufficient funds. A player can participate in any game only if the player has sufficient funds in his/her Member Account for such participation. It is the Company's policy not to accept cash and not to give any credit whatsoever for participation in any game.

#### **14.4 Withdrawals**

Withdrawal is only allowed if the name of person requesting the withdrawal is the same name of person holding the bank account.

The Company's policy is that it shall only affect payout to an account, card, wallet, or similar instrument in the name of the player receiving payout. Under no circumstances shall the Company effect a payout to a player in a name other than in the name of the player.

#### **14.5 Prevention of Prohibited Countries**

Inbuilt system blocks customers from logging in their gaming account from countries that are high risk as identified by the business or financial action task force.

#### 14.6 Internal Controls

Internal controls are not entirely computer dependent. The Operations Team also has an important part in detecting and preventing money laundering. The below are a number of controls operated by the Operations Team for ongoing monitoring and assessment of player's risk indicators and changes in player's patterns:

- The daily deposits report is reviewed by the payment and risk department, and follow-ups are made on suspicious transactions and manually entered deposits.
- Monitoring of large deposits and withdrawals and/or deposits and immediate withdrawals.
- All withdrawals are approved by a member of the Payment Department.
- The Operations Team confirms that the name of the person requesting the withdrawal is the same name of the person holding the bank account. Suspicious credit card deposits, transactions, and accounts are followed up by a verification process.
- Customer log activity is regularly analyzed for indications of suspicious activity.
- The operations team also prepares weekly and monthly high-level reports for review by top management.

#### 14.7 Additional Verification

Additional Verification on suspicious deposits, transactions, or accounts will include, but not limited to:

- Call Player to verify Telephone Number, take note of player's response/phone manner in call. This call is made by Support Staff in the same language of the player's account.
- Check if the player exists in the local country phone book, tax records, electoral register, and additional public databases, with the same information.
- Request ID, Proof of Address, copies, and statements of credit cards.

### 15. Reporting (Internal & External)

The Company's policy is that any knowledge or suspicion of money laundering activities must be immediately reported to the MLRO. Refer to specimen of Internal Reporting Form in Appendix 1.

On receipt of the report, the MLRO reviews the contents of internal reports, requests further information when required and then decides on the appropriate action to be taken. It also Company's policy that each decision, in respect of each and every report received, needs to be recorded (Refer to specimen in Appendix 2). MLRO files a Suspicious Transaction Report (STR) if he suspects or has reasonable grounds to suspect that.

- a transaction may be related to Money Laundering (ML) or Funding Terrorism (FT),
- or a person may have been, is, or may be connected with ML/FT.
- or ML/FT has been, is being, or may be committed or attempted.

The STR is drawn up by the MLRO as soon as reasonably practicable, but not later than 5 working days from when the suspicion first arose.

The Company strictly prohibits any *tipping off* by its personnel to players. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. Under no circumstances shall any officer, employee or appointed agent disclose or discuss any AML concern, investigation, notice or filing of the suspicious activity report with the person or persons subject of such, or any other person, including members of the officer's, employees, or appointed agent's family.

## 16. Record Keeping

The company's policy to maintain the following records.

- A copy of, or the references to, the evidence of the client's identity obtained; and
- Supporting evidence and records in respect of business relationships and occasional transactions, which are the subject of customer due diligence.
- Internal reports of MLRO and external reports made to the FIU.
- Records of AML training provided to employees.

Records are maintained for a period of 5 years, beginning on the date on which the business relationship ends.

## 17. Employee Vetting

The company follows high ethical standards in the recruitment of all its staff. This includes taking prospective employees' professional background into account, performing background checks, obtaining a certificate of good conduct from the local police authority, and verifying references provided, as per HR processes.

## 18. Communication and Training

The Company commits itself to ensure that all personnel are provided with training in the detection and treatment of transactions that may relate to money laundering. The level of training provided to an employee is appropriate according to the employee's role and responsibilities within the Company. Training on AML is aimed at ensuring that the Company's employees are.

- Able to identify a suspicious transaction.
- Know the procedure to follow if such circumstances are encountered,
- Know the provisions of the relevant law and regulations with respect to ML/FT,
- Be able to identify PEPs and perform proper KYC.

This AML manual is also available to all personnel of the Company.

## 19. Risk Assessment and Compliance Management

It is the policy of the Company to undertake a risk assessment for all clients and retain such assessment for a period of 5 years after we cease to act for the client.

## 20. Policy Distribution

All employees receive a copy of the AML policy and other associated policies upon induction, and each year, once a review is completed and signed, the new AML documents

is circulated to all staff, including subcontractors and Third-party suppliers when applicable by email, including a summary of any material changes.

### **Notification to customers**

On the Company's website under "terms and conditions" the Company will provide notice to its customers that it may collect certain customer identification information from each customer as well as that it is compliant with the AML regulations. Refer to abstract below.

- The Company complies with the Prevention of Money Laundering Act and Regulations issued thereunder.
- The Company shall check all transactions to prevent money laundering.
- The Company shall report any suspicious transaction to the relevant competent authorities.
- If You become aware of any suspicious activity relating to any of the Games of the Website, you must report this to the Company immediately.
- The Company may suspend, block, or close Your Member Account and withhold funds if requested to do so in accordance with the Prevention of Money Laundering Act.

Before registering an account, the Customer will have to agree to these Terms and Conditions.

This evidence will be obtained before the customer can access the online games. In the case that the customer is a Politically Exposed Person (PEP), the customer is considered as high risk and further due diligence procedures is performed at the Company's discretion.

In addition to completing the registration form, the Company may carry out additional verification procedures (such as an ID card or driving license) for any payout. If necessary, the Company will do a phone verification exercise, which will involve calling the number the user has stated and verifying the information provided by the player.

Once all the information requested is obtained, the Company sends a confirmation email to the customer via the email inserted by the customer in the registration form. The player account may be blocked or closed if the requested information or documents, or if such information or documents supplied is/are found false or misleading.

In addition, to the due diligence process performed at the initial acceptance stage, the players are monitored on an ongoing basis. Internal Controls, as per section G, provide the framework for ongoing monitoring of the players.

## **21. Due Diligence for Third Parties**

The company has processes in place, when applicable, to carry out due diligence upon establishing a business relationship in line with our regulatory requirements and to ensure that the company only works with reputable entities.

## **22. Policy URL**

This policy cannot be accessed online through the company website.

## 23. Compliance and Consequences of Non-Compliance

The company is obligated to apply to all regulations covered under section 2 of the regulatory framework within this policy. Should Deep Dive violate these regulations, the company can be subject to disciplinary actions, legal implications, or business risks.

In situations of non-compliance, the following actions could be taken:

- The company will be subject to regulatory fines.
- Regulatory enforcement.
- Respective action on particular regulations and processes.
- License revoked.
- Assess adequately the risk of money laundering or terrorist financing.

## Contact Information

Any questions regarding this policy, please contact:

Name – Mark Taylor

E-mail Address – markt@diligenzagroup.com

Contact Number - +356 99911164

## Appendix 1. References

United Nations - [Financial Sanctions Consolidated List](#)

European Union – [Consolidated list of sanctions](#)

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**END**

## Appendix A: Internal Suspicious Money Laundering Transaction Report Specific to Employees to be Submitted to the Money Laundering Reporting Officer

### Instructions for completion of the form

It is your legal duty and a requirement of your employment with this practice that you report any knowledge or suspicion concerning money laundering to the firm's MLRO.

In accordance with our internal procedures, you need to complete the report form as quickly as is practical. Should any delay be likely you need to contact the MLRO immediately.

The form should be completed in manuscript and delivered to the MLRO in a sealed envelope marked '**Addressee only.**' Please do not take any copies.

Tipping off is a criminal offence. You should therefore avoid discussing your suspicions or concerns with anyone other than the MLRO in all but the most unusual circumstances.

Failure to comply with these requirements may result in action being taken against you in line with the Company's usual disciplinary procedures.

|                                                                                                                                                                                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>To: The Money Laundering Reporting Officer</b>                                                                                                                              |
| Date of the report: [Insert date]                                                                                                                                              |
| Prepared by: [Insert name and position]                                                                                                                                        |
| Name of individual(s) suspected:<br>[Insert name of all individuals suspected]                                                                                                 |
| Name of client (if different):<br>[Insert client name or confirm that no difference from the list above]                                                                       |
| Reason for suspicion:<br>[Give a detailed description of the reasons for your knowledge or suspicions]                                                                         |
| Date suspicion first aroused: [insert date]                                                                                                                                    |
| Names of all other colleagues who have been involved with this client's affairs:<br>[Insert name of all individuals informed – each of whom should sign the declaration below] |

|  |
|--|
|  |
|--|

### ***Declaration Form***

I am aware of the risks and penalties regarding “tipping off,” or investigation of the above or related matters by the authorities.

|       |         |        |
|-------|---------|--------|
| Name: | Signed: | Dated: |
|       |         |        |
|       |         |        |
|       |         |        |

Appendix B: Form to be completed by the Money Laundering Reporting Officer upon receiving the above report from an Employee.

Date received \_\_\_\_\_

Consideration of Disclosure:

|              |
|--------------|
| Action Plan: |
|              |

Outcome of Consideration of Disclosure:

|                                             |
|---------------------------------------------|
| Are there reasonable Grounds for suspicion? |
|                                             |

|                                                                                                                                                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| If there is reasonable grounds to suspect Money Laundering, but you do not intend to report the matter, please set out below your reasons for non-disclosure |
|                                                                                                                                                              |

Signed \_\_\_\_\_ Dated \_\_\_\_\_

THIS REPORT SHALL BE RETAINED FOR A MINIMUM OF FIVE (5) YEARS

Revision History Details

| Version | Date | Details |
|---------|------|---------|
|         |      |         |
|         |      |         |