

AML/CFT Risk Management Overview

Westward Way Tech N.V. (registration No. 158203)

Business Model and Market Strategy

Strategic Dimension	Key Focus
Main Product	Pachinko, slots, live casino, sports betting (baseball, horse racing, boat racing), and bingo
Target Audience	Japan as core market aiming to be No.1 Pachinko operator
Core Features	Offering more than 5,000 different games for an unprecedented entertainment experience and Mobile-optimized UI
Marketing Channels	SEO, KOLs, social influencers, and sports sponsorships for brand visibility
Retention Strategies	Loyalty tiers, referrals, tournaments
Risk Controls	KYC/AML policies, volatility hedging, jurisdiction country banned

Identified AML/CFT Risk Categories and Mitigation Controls

Category	Example Scenarios	Risk Leve	Mitigation Controls
Customer Risk	PEPs, high-net-worth clients	Medium	Strict KYC/EDD policies and transaction monitoring
Product	Promotion Abuser, Hedging behavior	Medium	Set up turn over multiplier to prevent member withdrawal money without required betting amount, Game provide to investigate member betting behavior
Geographic Risk	Jurisdiction country banned	High	Strick Geo-IP restrictions
Transactional Risk	Huge deposit amount	High	Enhanced verification, transaction limits

Ongoing Monitoring and Review Framework

Review Framework	Method	Examples
Customer Monitoring Framework	Ongoing KYC/CDD	Trigger immediate review if red flags arise (e.g., mismatch of ID
Transaction Monitoring Framework	Rule-Based Alerts	Bets placed using multiple accounts/IP addresses. Frequent large withdrawals after small deposits
Geographic Risk Monitoring	Geo-IP Blocking	High-Risk Jurisdictions

Conclusion and Key Takeaways

1. Ongoing monitoring
2. Customer profiles must evolve
3. High-risk jurisdictions require strict controls
4. Member must pass KYC before can submit fiat currency deposit transaction
5. Suspicious behavior must trigger immediate action – Unusual betting activity, deposit–withdraw cycles