

# Dragon Money Customer Acceptance Policy (CAP)

## 1. Objective and Scope

This Customer Acceptance Policy (CAP) sets forth **Dragon Money's** standards and procedures for accepting and maintaining customer relationships in compliance with applicable Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) regulations. The policy's objective is to ensure that Dragon Money only engages with customers who meet stringent due diligence requirements, thereby protecting the casino from money laundering, terrorist financing, and other illicit activities. It is designed in alignment with **Curaçao Gaming Control Board (GCB)** and **Curaçao Gaming Authority (CGA)** guidelines, which require casinos to identify all players (no anonymous or fictitious accounts) and understand the nature of the customer's relationship with the casino. This CAP addresses the key elements mandated by regulators – including defining higher-risk player profiles, risk indicators for **low**, **medium**, and **high** risk levels, corresponding Customer Due Diligence (CDD) measures for each, and the circumstances under which service to a customer is declined.

**Scope:** This policy applies to all prospective and existing customers of Dragon Money's online casino platform, and to all departments (e.g. customer service, compliance, payments) involved in customer onboarding, verification, and monitoring. All employees must adhere to the procedures outlined herein. The CAP should be read in conjunction with Dragon Money's overarching AML/CFT Policy and procedures, and it is subject to periodic review to remain up-to-date with evolving regulations and best practices. Compliance with this policy is mandatory and may be audited by internal management as well as inspected by Curaçao regulatory authorities for adherence to AML/CFT requirements.

## 2. Risk-Based Customer Classification (Low, Medium, High)

Dragon Money employs a **risk-based approach** to categorize customers into **Low**, **Medium**, or **High** risk tiers. Each customer's risk level is determined by evaluating a range of risk factors, in line with global iGaming best practices and Curaçao AML guidelines. This classification helps the Company apply appropriate due diligence measures proportional to the risk each customer poses. Key risk factors considered in the customer risk assessment include:

- **Geographic Risk:** The customer's country of residence is assessed for money-laundering and terrorist-financing risk. Customers from jurisdictions with weak AML controls, high levels of corruption, subject to international sanctions, or identified by FATF as high-risk are rated higher risk. Conversely, customers from lower-risk jurisdictions (robust AML regimes and not under sanctions) may be classified as lower risk. *(Note: Dragon Money does not onboard customers from **prohibited jurisdictions** listed in Section 4 regardless of other factors.)*
- **Customer Profile Risk:** Certain customer attributes increase risk. For example, **Politically Exposed Persons (PEPs)** – individuals with prominent public functions or close associates/family of such – are automatically classified as **High Risk** due to the greater risk of corruption or bribery associated. Similarly, customers with negative background checks (e.g. appearing on sanctions lists, adverse media for financial crimes) are high risk. Customers with unclear or complex source of funds (multiple income sources or unusually large wealth relative to their profile) also indicate higher risk. In contrast, a customer with

a straightforward profile (e.g. stable employment, clear source of income, no adverse hits) might be rated lower risk.

- **Transactional Behavior & Deposit Size:** Dragon Money monitors how customers fund and use their accounts. Unusual or aggressive transaction patterns will elevate risk. Examples: a customer making **large deposits or withdrawals inconsistent with their stated profile**, rapid in-and-out fund transfers (potential “layering” of funds), or sudden spikes in gambling volume can indicate higher risk and prompt reclassification. Deposit size is a key factor – **single or cumulative transactions at or above NAf 4,000** trigger full identity verification per Curaçao regulations, and transactions reaching **NAf 5,000** or more are considered significant events that may warrant enhanced due diligence and possible reporting. Customers who stay below thresholds with small, routine play and no red flags are generally lower risk, whereas high-rollers or those with volatile activity are assessed as higher risk.
- **Delivery Channel & Technical Risk:** The manner in which the customer interacts with Dragon Money’s platform also affects risk. **Use of VPNs or proxies** (which is prohibited by the casino – see Section 4) or other methods to obscure identity/location is treated as a high-risk indicator since it may indicate the player is trying to bypass geo-restrictions or hide their identity. Additionally, if a customer’s device or IP data shows anomalies (e.g. multiple accounts from the same device or frequent IP changes), the risk rating is escalated. Dragon Money uses geo-location and device fingerprinting to detect such issues, ensuring the **customer’s stated location matches actual location data**.

Each new customer is assigned an initial risk rating based on the above factors at onboarding. The **Low/Medium/High** classification influences the level of due diligence applied (as detailed in Section 3) and the intensity of ongoing monitoring (Section 6). Risk classification is not static – it is **continuously reassessed** throughout the customer relationship. If new information arises (e.g. a customer’s transactions deviate from expectations, or a name appears on an updated sanctions list), Dragon Money will adjust the risk level and apply appropriate measures. By implementing this dynamic risk-based customer classification, Dragon Money ensures that higher-risk customers undergo greater scrutiny and controls, while lower-risk customers enjoy a proportionate, unobtrusive due diligence process.

### **Risk Tier Definitions:**

- **Low Risk:** Customers whose profile and behavior present a *minimal risk* of illicit activity. Typically, these are players from low-risk countries, with verified identity, relatively modest and consistent betting volumes, and no hits on PEP/sanctions or adverse media checks. Low-risk customers exhibit transparent sources of funds (e.g. salary or wages) commensurate with their gambling activity. They comply promptly with any KYC requests and show no signs of suspicious conduct. While identification is still required, they may be subject to only basic due diligence and standard monitoring.
- **Medium Risk:** Customers with a risk profile that is neither clearly low nor high. Many regular players fall into this category by default. Factors such as residence in a medium-risk jurisdiction, moderate levels of deposits, or minor inconsistencies in provided information can place a customer here. Medium-risk customers are trustworthy but warrant a closer look than low-risk – for example, their cumulative deposits may approach regulatory thresholds, or they have a slightly higher spending pattern relative to income. Dragon Money applies normal CDD measures to medium-risk players and keeps an eye on their activity for any elevation in risk indicators. If their behavior remains consistent and background checks are clean, they may be managed under routine monitoring. Any escalation in activity or new risk factors would move them to high risk.

- **High Risk:** Customers who pose a *heightened risk* of money laundering, terrorist financing, or regulatory compliance issues. This includes **PEPs**; customers from high-risk or sanctioned regions; those with large or atypical transaction patterns (e.g. extremely high deposits or rapid movement of funds); customers using **VPNs or concealing information**; and anyone who raises suspicion during KYC (e.g. submitting forged documents). High-risk customers require **Enhanced Due Diligence (EDD)** (see Section 5) and are subject to intensive monitoring. The Company performs deeper background checks on these individuals, which may include verifying source of wealth, conducting open-source intelligence (OSINT) research, and more frequent reviews. Senior management approval is required to **onboard or continue** relationships with high-risk persons in certain cases (especially PEPs). If the risks cannot be mitigated to an acceptable level, Dragon Money will refuse or terminate the business relationship (details in Section 7).

### 3. Onboarding Rules and KYC Requirements by Risk Tier

Dragon Money follows a tiered **Know Your Customer (KYC) verification process** during customer onboarding, ensuring that the depth of verification corresponds to the customer's risk level. All players must provide basic identifying information at registration, but the **verification steps and timing** differ by risk tier:

- **Low-Risk Customers:** At minimum, basic identity information (full name, date of birth, nationality, and residential address) is collected when the customer signs up. Low-risk players may initially undergo simplified due diligence, but **before their cumulative transactions reach NAf 4,000 or any withdrawal is processed, they are required to complete full identity verification**. This means providing a valid government-issued photo ID and other KYC documents as needed (see KYC components below). Dragon Money may allow low-risk players to deposit and play **below regulatory threshold limits** without immediate document verification, but **no customer remains anonymous** – identity verification will occur at the latest by the time total deposits or bets equal NAf 4,000, in compliance with Curaçao law. If a low-risk player never hits such thresholds, the Company still ensures identification is obtained within a reasonable timeframe to comply with the “no anonymous accounts” rule. Low-risk customers typically must at least verify their email and payment method ownership upon onboarding, and any indication of risk during play (e.g. unusual activity) would prompt earlier verification despite the low initial rating.
- **Medium-Risk Customers:** For medium-risk profiles, Dragon Money applies standard Customer Due Diligence measures *earlier* in the relationship. These customers are required to **verify their identity and address documentation before significant gameplay or transactions**. For example, a medium-risk player might be prompted to upload their **photo ID and a proof of address** (such as a utility bill or bank statement) upon making an initial deposit or before reaching a lower threshold (e.g. NAf 2,000 in cumulative deposits) – acting as a more cautious trigger than the statutory NAf 4,000. The Company verifies the authenticity of the documents and may perform a **liveness check/selfie** to ensure the account holder matches the ID. Medium-risk customers' information is also screened against sanctions and PEP databases at onboarding. By conducting verification relatively early, Dragon Money reduces the risk of medium-risk players reaching high transaction volumes without scrutiny. Any **discrepancy or concerning information** in the KYC documents (for instance, difficulty verifying the customer's address, or if the customer's IP location doesn't match their claimed address) could either suspend the onboarding process or elevate the customer to high risk for further checks. Medium-risk customers must complete all standard KYC steps *before* they are allowed to deposit beyond the NAf 4,000 threshold or withdraw any winnings, whichever comes first.

- **High-Risk Customers:** High-risk applicants are subject to **Enhanced Due Diligence (EDD) from the outset** – they must undergo comprehensive verification **prior to being allowed to deposit or gamble** (except perhaps a minimal initial deposit necessary to facilitate verification of payment method, if applicable, and even that under close oversight). Dragon Money’s onboarding team, in coordination with the Compliance Officer (MLRO), will obtain a full set of KYC documents immediately for high-risk customers. This includes: **government-issued photo identification, proof of residential address, a live selfie or video verification, and source of funds/wealth declarations** (e.g. a statement of how the customer has obtained the money they intend to gamble with). In addition, enhanced background checks are performed: the customer’s name is run through up-to-date sanctions lists, PEP lists, and adverse media databases to ensure they are not sanctioned or known for financial crimes. The customer’s device and IP are checked to confirm they are not using anonymization (VPN/proxy). **Senior management approval is required** before fully onboarding a high-risk customer or allowing them to continue playing, in line with regulatory expectations for EDD. If any requested KYC element is missing or unsatisfactory, the account remains restricted. Only once the Compliance department is satisfied that the customer’s identity is verified, their risk is understood, and their source of funds appears legitimate will the customer be allowed to have normal gaming access. High-risk customers are informed of the need for these stringent steps as part of Dragon Money’s commitment to regulatory compliance.

**KYC Verification Components:** In practice, Dragon Money’s onboarding team will collect and verify the following documentation and information from customers (as applicable by risk tier):

- **Government-Issued Photo ID:** A clear, valid passport, national ID card, or driver’s license must be provided by the customer to verify identity. The document must be unexpired and show the customer’s full name, date of birth, photograph, and unique identification number. Dragon Money uses independent verification tools to confirm the ID’s authenticity (checking security features, holograms, database checks). *All customers* will be required to submit an ID document **no later than when their transactions reach NAf 4,000**, and high-risk or suspicious customers must provide it immediately. The name and birthdate on the ID are cross-checked against the registration details. Any sign of a fake or altered ID leads to escalation and possible rejection of the customer.
- **Proof of Address:** To verify a customer’s residential address (which helps confirm their location and contactability), Dragon Money requires a recent document such as a utility bill, bank statement, or government correspondence that clearly shows the customer’s name and address. The document should typically be dated within the last 3–6 months. For low-risk customers, proof of address is obtained at least by the time of first withdrawal or hitting the NAf 4,000 threshold, whichever comes first. Medium and high-risk customers must submit proof of address during onboarding or early in their activity. The casino may verify the address through multiple means: examining document authenticity, using geo-location and IP data to ensure consistency, and even contacting the player via postal mail or telephone as needed. If a government ID provided already confirms address (some IDs contain address), a secondary document may not be necessary unless risk level dictates otherwise.
- **Selfie / Liveness Verification:** Dragon Money employs liveness checks to guard against identity fraud. Customers may be asked to take a live selfie or short video, sometimes holding their ID or a specific code, so the Company can confirm that **the person on the photo ID is indeed the one accessing the account**. This step is especially required for medium and high-risk tiers, and in cases of any doubt about impersonation (e.g., if the account shows activity from multiple devices or if the ID photo quality is low). Biometric face recognition tools can be used to match the selfie to the ID photo. A successful liveness

check significantly increases confidence in the customer's identity. Failure or refusal to complete a required selfie verification will result in the account being suspended pending compliance review.

- **Source of Funds and Source of Wealth Information:** For Enhanced Due Diligence, Dragon Money will request information and documentation about how the customer acquired the money they are using for gambling. **Source of Funds** refers to the specific funds used for gaming (e.g. a particular bank account, salary, crypto wallet), whereas **Source of Wealth** refers to the overall origin of the customer's wealth/net worth (e.g. accumulated savings from employment, inheritance, business ownership). High-risk customers – for example, those depositing **NAf 5,000 or more** in total or exhibiting wealth beyond what their profile suggests – must provide supporting evidence of their source of funds/wealth. Acceptable documentation may include: bank statements showing salary credits or business income, payslips from employer, tax returns, proof of asset sales (like real estate sale contracts), inheritance documents, investment portfolio statements, or any other evidence that **legitimately explains where their gambling funds come from**. Dragon Money's compliance team reviews this information to determine if the customer's spending is reasonable compared to their known income/wealth. If the explanation or documentation is insufficient or points to potential illicit sources, the Company will either request further detail or decline the customer (and possibly file a report). Source of funds checks are typically done for high-risk players at onboarding or upon triggering thresholds, and may be repeated periodically for ongoing high-risk relationships (see Section 5 and 6).

**Threshold Triggers & Account Restrictions:** In all cases, Dragon Money complies with Curaçao's threshold-based KYC triggers as a hard rule. **If a customer's aggregate transactions (deposits, wagers, or withdrawals) reach NAf 4,000 without complete CDD, the account will be temporarily restricted.** This means the player will not be allowed to deposit further or withdraw funds until all required KYC steps are finalized. (Notably, if the threshold is reached via a deposit, the player may be permitted to continue playing with their existing balance but cannot add more funds or cash out; if the threshold is reached at the point of a withdrawal request, the account is fully frozen pending KYC.) Dragon Money will notify the player of the need to complete verification in such a scenario. **A maximum of 30 days** is allowed for the customer to comply with KYC requests once the threshold is hit. If the customer fails to submit the required information within 30 days, the Company will terminate the relationship and, per legal requirements, return any remaining balance to the source of deposit or freeze funds as appropriate. Additionally, **any single transaction of NAf 5,000 or more** (or a series of linked transactions totalling that amount) is flagged for review; such cases will automatically prompt consideration of source of funds and potentially be reported as an Unusual Transaction to the Financial Intelligence Unit (FIU) in Curaçao. By enforcing these thresholds and KYC checkpoints, Dragon Money ensures full compliance with CGA rules on customer identification and prevents customers from circumventing due diligence by structuring transactions.

## 4. Prohibited Jurisdictions and VPN Restrictions

Dragon Money is committed to complying with its e-gaming licensing conditions and international sanctions. **Players from certain jurisdictions are not accepted** on our platform, either because online gambling is not permitted there, or due to sanctions or our licensing restrictions. The Company maintains a strict **Prohibited Jurisdictions** policy: individuals **residing in or accessing from** the following countries/regions are barred from registering or playing real-money games with Dragon Money (*this list is subject to update as laws change*):

- **United States of America** (including all U.S. territories)
- **France**

- **The Netherlands** (including constituent countries of the Kingdom of the Netherlands such as Curaçao, Aruba, Sint Maarten, and Bonaire)
- **Australia**
- **Austria**
- **Germany**
- **United Kingdom** (Great Britain and Northern Ireland)
- **Spain**
- **Union of the Comoros** (including Anjouan)
- **Any country or territory currently blacklisted by the Financial Action Task Force (FATF)** for AML/CFT deficiencies
- **Any other jurisdictions restricted by the Anjouan Offshore Financial Authority (AOFA)** or by our licensing authorities

These countries are blocked in our systems via GeoIP filters, and Dragon Money's terms of service explicitly prohibit any person located in or a resident of these areas from creating an account. **During registration, customers must confirm their country of residence** and are informed of the prohibited jurisdictions list.

**VPN and Proxy Use:** To enforce the above geographic restrictions and uphold compliance, Dragon Money **strictly forbids the use of VPNs, proxy servers, or other tools to mask a player's true location.** Allowing VPN usage would enable players from blocked regions to circumvent our geo-blocks, which could violate legal and licensing requirements. Therefore, any attempt to connect to our service through known VPN IP addresses or other anonymization services is detected by our security systems and will result in intervention. **Casinos ban VPNs primarily to enforce regional restrictions, prevent fraud, and comply with legal regulations,** and Dragon Money adheres to this principle. Our platform uses advanced methods to detect VPN usage, including monitoring for multiple accounts from the same IP and comparing KYC address details to login locations. If a player's registered address is in an allowed country but their login data consistently shows another location or use of a VPN service, we consider this a serious violation.

**Consequences:** If a customer is found to be **located in a prohibited jurisdiction or using a VPN to appear otherwise,** the account will be promptly suspended pending investigation. The Compliance Department will review any available evidence (e.g. login records, KYC documents) to confirm the player's true location. If it is confirmed that the player is in a banned region or deliberately misled the Company about their country, the account will be **closed** and any remaining balance handled in accordance with the terms and applicable regulations (funds may be returned to the source if legally permissible, or frozen if illicit activity is suspected). Additionally, **no withdrawals will be paid** to such customers except possibly back to the original payment source upon account closure after necessary checks. Dragon Money will document the incident, and if required, report the attempted breach to relevant authorities or the regulator.

By strictly enforcing country restrictions and banning VPN usage, Dragon Money ensures it **operates within legal boundaries** of its licensing and prevents exposure to sanctioned or high-risk markets. This approach protects both the Company and legitimate players, maintaining the integrity of our customer base.

## 5. Source of Wealth Criteria for Enhanced Due Diligence

For customers classified as **High Risk** or otherwise triggering Enhanced Due Diligence, Dragon Money requires detailed information about the customer's source of funds and source of wealth. The goal is to ensure that the money used in the casino originates from legitimate activities and

that the customer's overall wealth accumulation is not suspect. **Source of Wealth (SoW)** refers to the origin of the customer's overall net worth – the total accumulation of funds, property, investments, etc. over their lifetime (for example, employment income, business profits, inheritance, investments). **Source of Funds (SoF)** refers more specifically to the origin of the funds being used for gambling – such as a particular bank account, salary payment, or crypto wallet from which deposits are made.

Dragon Money employs the following criteria and procedures for Source of Wealth inquiries under EDD:

- **Triggers for SoW/SoF Checks:** A customer will be asked to provide source of wealth documentation in any scenario that implies higher risk or large transaction volume. This includes (but is not limited to):
  - Cumulative deposits or withdrawals above a certain high value threshold (e.g., **NAf 5,000** or equivalent, as an internal benchmark for substantial activity). Reaching this level, especially over a short period, prompts a source of funds review to understand how the player obtained these funds.
  - Customers identified as **PEPs** or having a high-risk occupation (e.g., known to be in sectors with higher corruption risk) – these individuals must undergo SoW checks regardless of transaction size, because even moderate amounts may warrant scrutiny given potential exposure to illicit funds.
  - Any indication of unusual wealth relative to the customer's profile. For example, if a player who claims modest employment is depositing very large amounts, or if a student with no obvious income is gambling big sums, the Company will require an explanation and proof of wealth origin.
  - **Unusual transaction patterns** that suggest possible money laundering – e.g. rapid cycling of funds, large deposits followed by immediate withdrawals. In such cases, beyond filing an Unusual Transaction Report, the Company will also seek to gather SoW information to assess if the pattern has an economic justification.
  - **High-risk country connections:** If a customer's funds appear to originate from, or are sent to, accounts in jurisdictions with poor AML controls, Dragon Money will treat this as high risk and request source of funds details.
- **Information and Documentation Requirements:** When a source of wealth/funds check is triggered, Dragon Money will ask the customer to **declare and provide evidence for their main sources of income or wealth**. The compliance team provides the customer with a questionnaire or request listing acceptable documents. **Examples of source of funds/wealth evidence include** (as applicable to the individual's situation):
  - Recent **bank statements** (typically 3–6 months) showing salary credits or regular income. If employment is the source, a **pay slip or employment contract** indicating salary may be required.
  - If the customer is self-employed or a business owner, **business financial statements, tax returns, or proof of business income** (invoices, contracts, etc.) can be provided.
  - For wealth derived from **investments or asset sales**: documents such as sale contracts (for real estate or vehicles), proof of stock or cryptocurrency sales, investment portfolio statements, or dividend statements.
  - If the funds come from a one-time event like **inheritance or gift**, a letter from an executor of estate, a copy of the will, or a notarized gift letter along with evidence of the benefactor's payment may be requested.
  - For **legal compensation or lottery/other gambling winnings**, official award or payout letters and bank records of the received funds.

- Any other pertinent documents that demonstrate legitimate origin of funds (e.g., pension statements for retirees, proof of property ownership and rental income, etc.).

Dragon Money recognizes that every customer's situation is unique; therefore, the Compliance team will use a risk-based judgment on which documents to require. The customer's cooperation and honesty in this process are mandatory. All documents received are reviewed for authenticity and plausibility.

- **Assessment of Source of Wealth:** Simply collecting documents is not sufficient – Dragon Money will analyze them to ensure the customer's gaming activity is **consistent with their known wealth and income**. For instance, if a customer provides pay stubs showing an annual income of NAf 50,000, it would be alarming if they are gambling tens of thousands of guilders in a short time. The compliance analyst will check that the **level of play is reasonable given the source of wealth** provided. If the documentation indicates, say, personal savings or an asset sale of NAf 100,000, then deposits totaling NAf 5,000–10,000 might be reasonable. But if a customer's explanation appears inconsistent or insufficient for the volume of transactions, Dragon Money will take action (which could include limiting account activity, requesting additional info, or terminating the account).
- **Enhanced Verification Measures:** As part of EDD, the Company may also undertake independent verification of the information provided. This can include searching public records or databases for business ownership and directorships, performing internet research on the customer's background (to identify any undisclosed adverse information), or using third-party providers to verify income estimates for certain occupations or industries. The **regulatory guidelines recommend obtaining additional information such as occupation and using open sources** as needed. Dragon Money follows this guidance, for example checking a PEP's asset declarations if publicly available, or verifying that a customer's employer actually exists. We also ensure that the **first payment** into the gaming account comes from a payment method (bank account, card, e-wallet) in the customer's own name, as an extra control – this way we avoid third parties funding a player's account. Any discrepancies (like a deposit coming from someone else's account) would lead to further inquiry.

All findings from the Source of Wealth investigation are documented in the customer's file. If a customer **refuses to provide** adequate SoW information or if the provided information raises **serious concerns**, Dragon Money will re-evaluate the risk of continuing the relationship. High-risk players who cannot satisfactorily demonstrate legitimate fund sources will be reported to the FIU as required and may be subject to account closure (see Section 7 for decision authority on such cases). **Periodic Updates:** Even after initial EDD, Dragon Money may request updated source of funds information from high-risk customers **on a periodic basis** or if new high-risk transactions occur. This ensures we maintain an up-to-date understanding of how a long-term high-risk customer continues to fund their play, and it acts as a deterrent against complacency in monitoring. By rigorously applying source of wealth criteria, Dragon Money reinforces its defense against being misused for money laundering, consistent with both local Curaçao requirements and international AML best practices.

## 6. Ongoing Monitoring and Reassessment

Customer due diligence does not end after onboarding – Dragon Money maintains a robust **ongoing monitoring** program to supervise customer activity throughout the life of the account. The purpose of ongoing monitoring is to ensure that each customer's gambling and transactional

behavior remains consistent with the risk profile and information we have on that customer, and to detect any suspicious or unusual activities at an early stage.

**Automated Transaction Monitoring:** The Company utilizes automated monitoring systems and analytics tools to track customer transactions (deposits, wagers, wins/losses, withdrawals) in real time. These systems are configured with rules and thresholds aligned with the customer's risk level. For example, a deposit or withdrawal that is unusually large relative to a player's past behavior, or rapid sequences of transactions that could indicate structuring, will generate an alert. **Patterns that trigger alerts include:** sudden spikes in deposit size, frequent large cash-outs, multiple accounts using the same payment method or IP address, rapid turnover of funds (money comes in and out with minimal play), and repeated attempts to transact just below reporting thresholds. Additionally, if a customer attempts to access the service from a new location or device that is inconsistent with their profile, the system flags this as well. These alerts are reviewed by the compliance team daily.

**Behavior Monitoring:** Beyond pure financial transactions, Dragon Money monitors gameplay behavior for irregularities. Unusual betting patterns (such as deliberately losing money to another player if peer-to-peer games are offered, or collusion signals) are watched for, as they could indicate chip-dumping or other forms of money laundering through gambling. Our fraud team and AML compliance team work together to analyze such patterns. If any **deviation from expected behavior** is identified – for instance, a typically low-stakes player suddenly betting maximum amounts, or an account that was dormant becomes very active – the account is marked for a closer review.

**Screening Updates:** Ongoing monitoring also encompasses **periodic rescreening of customer names against sanctions and PEP lists**. Sanctions lists (UN, EU, OFAC, etc.) and PEP databases are updated regularly. Dragon Money ensures that its customer database is automatically rescreened whenever there are updates to these lists, or at minimum on a scheduled basis. If a customer is newly found on a sanctions list or becomes a PEP during the relationship (for example, a customer gets elected to political office), our system will flag it. In the event of a **positive match or material change** in status, the compliance team will immediately review the account and decide on appropriate action (which could include freezing funds, enhanced due diligence, or terminating the account, depending on the situation and legal requirements).

**Risk Profile Reassessment:** Information gathered from ongoing monitoring feeds back into the customer's risk rating. Dragon Money will **update the customer's risk classification** if warranted by their behavior. For instance, if a low-risk customer begins transacting in large volumes or exhibits suspicious behavior, the risk rating will be elevated to high and EDD measures will be applied. Conversely, if a medium-risk customer remains consistently low-volume and gains a history of trustworthy behavior, we might maintain or even consider lowering their risk rating after a long period, though never below the level justified by their country or profile. All reclassifications are documented with rationale.

**Unusual Transaction Reports (UTRs):** As required by Curaçao's LMOT (Unusual Transactions Reporting Ordinance), any transaction or activity that appears to be **suspicious or unusual** must be reported to the Financial Intelligence Unit. Dragon Money's compliance officers are trained to recognize red flags and utilize the monitoring system's output to identify reportable events. Examples of reportable unusual activities include: transactions that have no apparent economic or lawful purpose, attempts by a customer to avoid reporting thresholds, deposits or withdrawals involving third parties not on the account, or any activity that might indicate proceeds of crime being used. If an alert is deemed suspicious upon investigation, the MLRO will promptly file a UTR with the FIU. **Importantly, the CAP and related procedures ensure that such reporting**

**is done without “tipping off” the customer** – staff are instructed not to inform the customer that a report is being filed. In some cases, if continuing with customer due diligence might alert the player (e.g. repeatedly asking questions about a transaction), the compliance team may choose to discontinue the process and file a report instead.

**Periodic Account Reviews:** For customers in higher risk tiers, Dragon Money conducts thorough periodic reviews of the account. **A High-Risk customer’s account is reviewed at least annually (or more frequently if required by regulation).** This review entails verifying that all KYC information is up to date (requesting refreshed documents if any have expired, like passports), re-assessing the source of wealth if the customer’s financial activity has significantly changed, and ensuring enhanced monitoring is capturing their activity accurately. Medium-risk customers might be reviewed on a rolling basis every few years or upon certain trigger events (such as a big jump in activity). Low-risk customers are generally reviewed when specific triggers occur (e.g. if they unexpectedly cross a threshold or if a sanctions list update flags them), rather than on a fixed schedule, due to their lower impact. These periodic reviews are documented, and any decision to maintain or change the risk status is recorded.

Through comprehensive ongoing monitoring, Dragon Money **matches transactions against each customer’s risk profile and known source of funds**, enabling the detection of anomalies. This ongoing vigilance ensures that any suspicious behaviors are promptly detected, investigated, and reported, thereby keeping the casino in compliance with AML obligations and safeguarding the platform from being misused by bad actors. The continuous monitoring process is a feedback loop that strengthens the initial customer acceptance decisions with real-world data, allowing Dragon Money to take swift action if a customer’s risk profile deteriorates over time.

## **7. Decision-Making Authority for Customer Rejection or Suspension**

Dragon Money reserves the right to **decline to onboard a new customer or to suspend/terminate an existing customer relationship** if at any point the individual is found to pose unacceptable risk or violates our compliance policies. Such decisions are not taken lightly; they follow a defined internal process and are made by authorized personnel with due consideration of the facts and regulatory requirements.

**New Customer Rejection:** During the onboarding phase, if a prospective player fails to meet the CAP criteria, the Compliance team will recommend rejecting the application. Specific grounds for rejection include: failure to provide valid KYC documents, submission of fraudulent or altered documents, appearing on a sanctions/terrorism watchlist, being a resident of a prohibited jurisdiction, or any information suggesting the person is misrepresenting their identity or intent. The **Compliance Officer/MLRO (Money Laundering Reporting Officer)** has the authority to approve or deny new customer applications that trigger compliance concerns. In practice, the customer support or verification agents escalate any problematic cases to the Compliance Officer. For instance, if a document verification service flags an ID as forged, or if a due diligence check finds the person has a history of financial crime, the MLRO will be informed and will decide to reject the registration. This decision is then communicated to the player (usually in general terms, e.g. “we are unable to offer you an account”), without tipping off any specific suspicion. A record of the denial, including reasons and any supporting evidence, is kept on file. If required by law (for example, if an attempted account creation by a sanctioned individual occurred), a report to authorities will be made.

**High-Risk Approval and Escalation:** By default, **any customer classified as High Risk requires senior management approval to be accepted as a customer.** Dragon Money's policy is that the **MLRO and at least one senior executive (e.g., the Compliance Manager or designated Director)** must sign off on retaining a high-risk customer after EDD is completed. This includes PEPs, or customers with large wealth and complex profiles. If the EDD results are satisfactory and risks can be mitigated (for example, we obtained solid proof of source of wealth and set heightened monitoring), management may approve the account to continue. However, if **any doubt remains about the legitimacy of the customer or their funds**, the Company's stance is conservative – the customer will be declined or exited. The CAP empowers the Compliance department to put the protection of the business and legal compliance above short-term revenue considerations when making these decisions.

**Suspension/Termination of Existing Accounts:** If an active customer's risk profile changes or a serious compliance issue arises, Dragon Money can suspend or terminate the account to prevent further activity while the matter is investigated. Scenarios leading to suspension include: a customer **becoming a sanctions hit or PEP**, new adverse information (e.g., news of an arrest) coming to light, refusal to comply with an updated KYC or source of funds request, detection of fraud or deceptive practices (like using VPNs or multiple accounts), or suspicious transaction patterns that strongly indicate possible money laundering. The authority to suspend an account immediately often lies with the MLRO or a delegate in the Compliance team, who can impose a freeze on the account **while escalating the issue to senior management.** Internally, a Suspicious Activity Report will be prepared for the MLRO's review. The MLRO will then decide, in consultation with legal counsel if needed, whether to permanently close the account. If the decision is to terminate, appropriate steps are taken to settle or seize any remaining balance according to legal guidance, and a UTR is filed with the FIU if the circumstances warrant.

**Documentation and Review:** Every decision to reject, suspend, or terminate a customer for compliance reasons is documented in Dragon Money's records, including the rationale and approval by the responsible authority. The Board of Directors or senior management is periodically informed of such actions as part of compliance reporting, ensuring oversight. Moreover, these decisions are made in line with applicable laws – for example, if an account is closed due to suspected money laundering, the customer is generally **not informed of the exact reason** (to avoid tipping off), and any required notifications to regulators are handled confidentially.

**Customer Communication:** In cases of rejection at onboarding, the prospective player is usually just informed that the account cannot be opened. In cases of suspension or termination, Dragon Money will communicate to the customer that their account has been suspended or closed per the platform's terms and conditions. We typically do not provide detailed specifics if related to an AML investigation, beyond possibly requesting the customer to contact support for further instructions (where we might simply say it's a business decision). If the customer wants to dispute or provide additional information (for instance, if they failed to provide KYC in time and want to now comply), the Compliance team reviews such responses, but no gaming activity is allowed until/unless a favorable decision to reinstate is made. Reinstatement of a suspended account also requires Compliance approval and usually new evidence of compliance.

**Regulatory Reporting:** If a customer is rejected or terminated due to verified involvement in illicit activity or appearing on a sanctions list, Dragon Money will report this to the Curaçao Gaming Authority and other relevant bodies as required. Our CAP aligns with regulatory expectations that casinos must decline or cease business with customers in certain high-risk scenarios and report the matter. For example, if we detect a sanctioned individual attempted to withdraw funds, we would freeze and report that immediately in accordance with sanctions compliance obligations.

In summary, the authority to reject or suspend customers lies primarily with Dragon Money's **Compliance function (led by the MLRO)**, with oversight and approval from senior management for material cases. This ensures that decisions are made by personnel knowledgeable about AML/CFT risks and that those decisions are backed by the highest level of the company when needed. By centralizing this authority, Dragon Money maintains consistent application of its CAP and avoids any conflict of interest with business units. Protecting the casino's integrity and license is paramount; therefore, **any customer that jeopardizes compliance will be promptly refused service** in line with this policy.

## 8. Reference to AML Policy and Program

This Customer Acceptance Policy is a core component of Dragon Money's overall AML/CFT compliance program. It complements and should be read in conjunction with the **Dragon Money AML/CFT Policy** (the master policy outlining the company's anti-money laundering controls, procedures, and staff responsibilities). The AML Policy provides additional details on areas such as record-keeping, internal reporting workflows (e.g. how staff should escalate unusual activity to the MLRO), employee training requirements, and the handling of **Unusual Transaction Reports**. For instance, while the CAP defines *who* we accept as customers and under what conditions, the AML Policy covers *how* we monitor those customers and report suspicious actions in practice.

Key linkages between this CAP and the AML Policy include: the risk assessment methodology (the AML Policy describes the overall risk assessment that informs customer risk ratings), specific CDD/EDD procedures (the CAP summarizes them by tier, while the AML Policy may contain step-by-step operational guidance and reference to laws), and sanctions/PEP screening processes (the CAP mandates screening at onboarding and ongoing monitoring, and the AML Policy would detail the tools and lists used for screening). Both documents are aligned with the latest **Curaçao regulatory requirements** and **FATF Recommendations**, ensuring consistency.

Employees are expected to be familiar with both the CAP and the AML Policy. The CAP sets the front-line rules for customer onboarding and acceptance, and if any situation is not addressed in detail here, staff should refer to the AML Policy or seek guidance from the Compliance Officer. Together, these documents ensure Dragon Money meets or exceeds the AML/CFT standards set by the Curaçao Gaming Control Board and Gaming Authority. The CAP may reference specific sections of the AML Policy for further guidance (for example, "see AML Policy Section 5 for detailed KYC verification procedures").

**Regulatory Inspection:** Both this CAP and the full AML/CFT Policy are available for review by regulators and auditors. They demonstrate Dragon Money's commitment to a risk-based approach in customer due diligence and its adherence to the legal obligations such as the National Ordinance on Identification when Rendering Services (LID) and the National Ordinance on the Reporting of Unusual Transactions (LMOT) of Curaçao. The CAP is maintained as an internal document but can be provided to the Curaçao Gaming Authority or other relevant bodies to evidence our customer acceptance standards.

**Continuous Improvement:** Dragon Money will update this CAP as needed to reflect changes in regulations (for example, if new thresholds or risk factors are introduced by law) and lessons learned from its own risk assessments and audits. Any updates will be cross-referenced in the AML Policy to ensure consistency. Staff will be notified and trained on changes accordingly. By integrating the CAP with our broader AML framework, Dragon Money ensures a coherent and effective approach to preventing financial crime in its operations while enabling a positive but safe experience for genuine customers.

This policy is effective as of **3 July 2025**, and is reviewed and approved by the designated Compliance Officer (MLRO) in accordance with internal governance procedures.

Kateryna Veremiienko  
Compliance Officer (MLRO)

