

IT Management Santora B.V. - CLIENT RISK ASSESSMENT																			
Customer Risk			Channel Risk			Funding Method Risk			Product Risk			Jurisdiction Risk**			Other Risks / High Risk Triggers			TOTAL RISK SCORE	RISK CLASSIFICATION
Customer Type	Score	Actual	Channel Type	Score	Actual	Funding Type	Score	Actual	Product Type	Score	Actual	Jurisdiction	Score	Actual	Other	Score	Actual		
Client is PEP	50	0	Non-Face to Face	20	0	Skrill	13	13	Casino Games			Birth Place is Low Risk Country	10	10	Attempt to use fake documentation	50	0		
Client not PEP	10	10	Non-Face-to-Face using digital ID&V and Biometric verification (Sumsb)	10	10	Neteller	13	0	Slots	10	0	Birth Place is Medium Risk Country	13	0	Attempt to open multiple accounts from same location	50	0		
Client Sanctioned	50	0				Muchbetter	13	0	Roulette	13	0	Birth Place is High Risk Country	20	0	Abnormal betting pattern identified	50	0		
Client not Sanctioned	10	10				Instadebit	10	0	Live Casino Games			Birth Place is Non-Reputable Country	50	0	Deposit/withdrawal requests without explanation	50	0		
Client has Adverse Media	50	0							Blackjack	20	0	Residency in Low Risk Country	10	0	Attempted payment by third party	50	0		
Client no Adverse Media	10	10							Roulette	13	0	Residency in Medium Risk Country	13	0					
Authenticity Issues	50	0							Baccarat	20	20	Residency in High Risk Country	20	0					
No Authenticity Issues	10	10							Poker Cash Games	20	0	Residency in Non-Reputable country	50	0					
Reluctant to provide DD	50	0							Poker Tournament	13	0	Vested interest in Low risk Country	10	0					
Single Source of Income	10	10							Sportsbook			Vested interest in medium risk country	13	0					
Multiple Source of Income	13	0							Football	13	0	Vested interest in high risk country	20	0					
Wealth from High-risk sources	50	0							Basketball	13	0	Vested interest in non-reputable country	50	0					
Wealth not from High-Risk sources	10	10							Tennis	13	0								
		American Football							13	0									
		Ice Hockey							13	0									
		Virtual Sports																	
		Virtual Football							13	0									
		Virtual Cycling							13	0									
		Virtual Horse Riding							13	0									
		Virtual Greyhounds							13	0									
		Virtual Drag Racing							13	0									
		Virtual Tennis							13	0									
		e-Sports																	
		Counter Strike							13	0									
		Call of Duty							13	0									
		StarCraft							13	0									
		Halo							13	0									
		e-Football							13	0									
		e-Basketball							13	0									
MAXIMUM SCORE		10		10		13		20		10		0	63	Medium					

**Each specific country's risk level is identified through a separate country risk assessment/report.

Summary of Risk Assessment	
Client Name	
Client Reference Number	
Risk Assessed	Medium
Date of Risk Assessment	