
Paloma Media B.V.

OGL/2024/677/0722

Provisional Online gaming license under LOK

To: Curaçao Gaming Authority

17 June 2026

Reference; CGA checklist; Anti-Money Laundering Policy 2.0



WHAT WAS ALREADY INCLUDED :

1. **Approval and signature by the Managing Director:** The AML Policy was approved and signed by the Managing Director on 28 May 2025. The revised version of the Policy has also been provided with Director approval, confirming that the updated Policy has been formally reviewed and approved.
 2. **Reporting Procedures:** The applicable internal reporting procedures are included in the Policy, with reference Section 7 (version 2.0) and Section 5 (version 2.1) (no changes).
 3. **CO Responsibilities:** The reporting line, authority, independence, and responsibilities of the Compliance Officer are already addressed in Section 8.1.1 (version 2.0) and Section 6.1.1 (version 2.1) (no changes).
 4. **Third Parties:** The Policy addressed the use of third parties in general terms under Section 5.7 (version 2.0) and Section 4.8 (version 2.1), which formalizes third-party reliance and outsourcing arrangements, where applicable, including the expectations around control, oversight, and accountability.
 5. **Sanctions Screening:** The Policy outlines the sanctions screening procedure, including screening frequency, rescreening requirements, escalation procedures, and governance controls under Section 2 (version 2.0) and Section 4.5 (version 2.1) – the section was moved in the updated policy version for a more logical flow.
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6. **AML Reporting to Management:** The Policy described the Compliance Officer's general reporting responsibilities under Section 8.1.1 (version 2.0) and Section 6.1.1 (version 2.1), including AML management reporting procedures to senior management and/or the Board.

UPDATES SUMMARY:

The AML Policy of Paloma has gone through an annual revision process, triggered by the CGA's comments. The changes between versions 2.0 and 2.1 are as follows:

1. Removal of repetitive definitions of ML and TF in Section 2 – these terms are already defined in Section 1.
2. The Business Risk Assessment (Section 3.2) section has been enhanced and expanded to better reflect the process and scope of conducting a BRA. A reference is made to the risk appetite of the Company; separate AML/CFT/CPF Risk Appetite Statement will be drawn up by the Compliance Officer.
3. Customer Risk Assessment (Section 4.1.1) section was rewritten to make it more procedural and risk-based to establish a formal customer risk-rating methodology, including risk classifications and assessment criteria. The customer risk factors were rewritten to focus more clearly on the customer's background, occupation or business activity, expected account activity, source of funds where relevant, transaction patterns, and other known information. Reduced or removed casino-specific examples that were less relevant or overly narrow. The product/service risk section was revised to focus on the Company's gaming products, services, account functionality, and payment methods.
4. A dedicated Source of Wealth (Section 4.3.1) section was added under EDD. Added examples of acceptable sources of wealth, supporting documentation, verification standards and recordkeeping requirements.
5. Transaction monitoring (Section 4.7.2) was expanded to refer to consistency with the customer's declared or expected source of funds and anticipated betting and transactional behaviour.
6. Added a new Source of Funds framework (Section 4.7.2) where activity is inconsistent with the Company's knowledge of the customer. Added examples of source of funds, acceptable supporting documentation, verification requirements, escalation and approval requirements.

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7. Section 5.1 was updated to confirm that the Company is registered with the FIU Curaçao's goAML platform for submission of unusual transaction reports.
 8. The Policy (Section 6.1) now specifically identifies Curliegh Cochrane as the appointed Compliance Officer. Added the Compliance Officer contact email.