

Know Your Customer Policy

1. Policy Overview

This Know Your Customer Policy ensures that Arena Sports Entertainment N.V complies within their licenses regulatory framework, prevents identity fraud, supports responsible gambling, and meets Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) obligations.

Please also refer to Arena Sports Entertainment N.V's Terms and Conditions and Anti-Money Laundering Policies.

2. Scope of Policy Application

This policy applies to:

- All users registering on the platform
- All transactions involving deposits, withdrawals, and betting activity
- All employees and third-party service providers involved in customer onboarding and monitoring

3. Customer Due Diligence

3.1 Customer Due Diligence Obligations

- Arena Sports Entertainment N.V has implemented customer due diligence (CDD) processes which are appropriate, proportionate to the nature and size of its business and tailored to its various business activities.
- Arena Sports Entertainment N.V carries out CDD on all customers to mitigate the risks of ML and FT. CDD is the process of obtaining information to know your customer. It can include simplified due diligence (SDD) measures or enhanced due diligence measures (EDD).
- Arena Sports Entertainment N.V must assess whether to apply SDD or EDD on a risk-sensitive basis, taking into account a non-exhaustive list of factors, including the purpose of an account or relationship, the level of assets to be deposited by a customer or the size of transactions undertaken, the regularity or duration of the business relationship and geography.

3.2 Customer Due Diligence – Individuals

In each case of a customer engagement, Arena Sports Entertainment N.V must obtain:

- Full name
- Residential address
- Date of birth

This information must then be verified.

Documents that could be used to meet this requirement are listed below.

Documents that identify the individual	Documents that verify the individual's address
Current signed passport	Signed record of home visit
Residence permit issued by home country on sight of own country passport	Recent (within the past 6-months) utility bill that has been posted to the individuals home address
Current photo-card driving licence	Local authority utility bill (valid for the current year)
Firearms certificate	Bank, building society statement or passbook

The above lists are not exhaustive and here appropriate other forms of identification can be presented. Documents listed in the first column may also be used to verify the individual's address but the same document cannot be used to verify both the individual's identify and his or her address.

There are also a number of sources of electronic data that may be used but should not be relied upon as the sole means of identifying the individual.

If using electronic data as the sole means of verifying identity, then the source must be one that uses data from multiple sources collected over a period of time or incorporates checks that assess the strength of the information supplied such as one of the specialist agencies used by Arena Sports Entertainment N.V for these purposes.

Failure to obtain CDD will cause the client account to be frozen and relationship termination process to be initiated.

3.3 Customer Due Diligence – Companies and Other Incorporated Entities

An incorporated entity is identified by:

- It's registered number;
- It's registered corporate name and any trading names used;
- It's registered address and any separate principal trading addresses.

When identifying a corporate, employees should also obtain information about:

- It's directors or partners (as appropriate);
- It's owners and shareholders;
- The nature of the business.

Documents that could be used to meet these requirement are listed below.

Documents Suitable for Verifying Corporate Identity
Certificate of Incorporation
Certificate of Registration
Memorandum and Articles of Association
Partnership Agreement
Shareholder Register
Most Recent Report and Accounts

Employees should ask to see at least two of these documents.

For each Corporate client, employees should obtain a list of all directors and shareholders or partners. The identity of at least two executive directors or partners should be verified. At least one of these must be the person authorised by the client to instruct Arena Sports Entertainment N.V. The identity of the major shareholders (anyone with an interest of 25% or more) should also be obtained and verified.

Failure to obtain CDD will cause the client account to be frozen and relationship termination process to be initiated.

3.4 Enhanced Due Diligence

EDD measures include CDD and further measures as detailed below:

- Specific controls for business relationships or transactions involving high-risk third countries;
- Seeking additional independent, reliable sources to verify information provided or made available to us;
- Gathering further information about the customer to better understand the nature of the customer's business or their financial situation, and to determine the customer's reputation from publicly available information;
- Examining the background and purpose of the transaction, as far as reasonably possible, and taking steps to be satisfied that the transaction is consistent with the purpose and intended nature of the business relationship;
- Taking adequate measures to establish the source of wealth and source of funds that are involved in the business relationships or transactions with the customer;
- Assessing a corporate customer's AML/CFT controls;
- Increasing the degree and nature of monitoring of the business relationship in which the transaction is made, to determine whether the transaction or the relationship appear to be suspicious;
- Obtaining approval from MLRO before establishing or continuing a business relationship.

4. Customer Verification of Your Identity and Money Laundering Requirements

The customer warrants that:

- You are over 21-years of age;
- The name and address you supply when opening your Account are correct;
- You are the rightful owner of the money which you at any time deposit in your Account.

By agreeing to the Terms of Use you authorise us to undertake any such verification checks from time to time as we may require ourselves or may be required by third parties (including, but not limited to, regulatory bodies) to confirm these facts. You agree that from time to time, upon our request, you may be required to provide additional details in respect of any of such information you have provided us, of any deposits which you have made into your Account.

Whilst we are undertaking any checks from time to time, we may restrict you from withdrawing funds from your Account and/or prevent access to all or certain parts of the website. Please note that we may from time to time re-perform the checks for regulatory, security or other business reasons. If such any such restrictions cause you a problem, please contact Customer Services.

In certain circumstances we may have to contact you and ask you to provide further information to us directly in order to complete the checks. If you do not or cannot provide us with such information then we may suspend your account until such time as you have provided us with such information, and/or permanently close your account.

It is an offence for persons under the relevant age to make use of the website. If we are unable to confirm that you are the relevant age then we may suspend your account until such time that we are able to confirm that you are the relevant age. If you are subsequently proven to have been under the relevant age at the time you made any gambling or gaming transactions with us, then:

- Your account will be closed;
- All transactions made whilst you were underage will be made void, and all related funds and any stakes for bets made while you were underage will be returned to you;

Any winnings which you have accrued during such time when you were underage will be forfeited by you and you will return to us on demand any such funds which have been withdrawn from your account.

Arena Sports Entertainment N.V reserves the right to:

- Refuse registration or suspend accounts for non-compliance
- Delay or deny withdrawals pending verification
- Report suspicious activity

5. On-going Monitoring

Arena Sports Entertainment N.V must, on a risk-sensitive, ongoing, basis, scrutinise transactions undertaken throughout the course of the relationship with the customer (including, where necessary, the source of funds) to ensure that the transactions are consistent with its knowledge of the customer, the customer's activities and risk profile.

Arena Sports Entertainment N.V must also undertake reviews of existing records and keep the documents or information obtained for the purposes of applying CDD up to date. Particular regard should be had to transactions that are complex, large and unusual or part of an unusual pattern, or concern customers identified as 'high risk'.

6. Data Privacy: How We Use Your Personal Information

All information on your account held by us is securely data warehoused and remains confidential except where otherwise stated in the Terms of Use.

We are required by law (in particular by the Data Protection Act 1998 in the UK and, where relevant, the Data Protection Act 2004 in Gibraltar) to comply with data protection requirements in the way in which

we use any personal information collected from you in your use of the website. We therefore take very seriously our obligations in relation to the way in which we use Your personal information.

When you use the website, it will be necessary for us to collect certain information about you, including your name and date of birth, your contact details, and may also include information about your marketing preferences (all of which shall be known as Your Personal Information).

By providing us with your Personal Information, you consent to our processing your Personal Information, including any of the same which is particularly sensitive:

- For the purposes set out in the Terms of Use (including the Privacy Policy);
- For other purposes where we need to process your Personal Information for the purposes of operating the website, including by sharing it with our service providers and agents for these purposes, for example to our providers of postal services, marketing services and customer services agents. We may also disclose your Personal Information personal data in order to comply with a legal or regulatory obligation.

We will retain copies of any communications that you send to us (including copies of any emails) in order to maintain accurate records of the information that we have received from you.

7. Contacting Us

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