

ANTI MONEY LAUNDERING POLICY

Table of Contents

Item Number	Content	Page Number
1	Policy Statement Overview	
2	Purpose	
3	Audience	
4	Definitions 4.1 Money Laundering (ML) 4.1.1 Money Laundering 4.1.2 Examples of Money Laundering Risks in the Industry 4.1.3 Knowledge or Suspicion 4.1.4 Examples of Activities Which May Lead to Knowledge or Suspicion 4.2 Financing of Terrorism (FT) 4.2.1 Financing of Terrorism 4.2.2 Examples of Terrorist Financing Risks in the Industry 4.3 Money Laundering Reporting Officer	
5	Policy Implementation 5.1 Arena Sports Entertainment N.V's Obligations 5.2 Arena Sports Entertainment N.V's Policy and Procedure Obligations 5.3 Business Risk Assessment 5.3.1 Sanctions Screening Procedures 5.3.2 Transaction Monitoring Controls 5.3.3 Source of Funds and Source of Wealth Procedures 5.4 Customer Risk Assessment 5.5 Customer Acceptance Policy 5.6 Customer Due Diligence 5.6.1 Customer Due Diligence Obligations 5.6.2 Customer Due Diligence – Individuals 5.6.3 Customer Due Diligence – Companies and Other Incorporated Entities 5.7 Enhanced Due Diligence 5.8 On-going Monitoring 5.8.1 Ongoing Monitoring and Review Frequency 5.9 Reliance on Third Parties to Perform Customer Due Diligence 5.10 Reporting of Suspensions and Unusual Transactions 5.10.1 Employee Responsibilities for Reporting 5.10.2 MRLO Responsibilities for Reporting 5.10.3 Annual Report 5.10.4 Blocking of Accounts 5.10.5 Employee Training 5.10.6 Record Keeping and Audit Trail 5.10.7 Governance and Oversight 5.10.8 Independent Testing and Compliance Review 5.11 Anti-money Laundering Compliance Programme	
6	Contact Information	
7	Policy URL	

3. Audience

This Policy applies to all persons working for, or on behalf of, Arena Sports Entertainment N.V in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers and interns.

Where appropriate, the Policy applies to agents, contractors, external consultants, third-party representatives, business partners, sponsors, or any other person associated with Arena Sports Entertainment N.V, wherever located.

From time to time Arena Sports Entertainment N.V will engage third party specialists to advise on ML and FT matters. This does not, however, absolve employees from their obligations and responsibilities in relation to ML and FT.

Where local AML/CFT laws and regulations apply in any country in which Arena Sports Entertainment N.V operates, those laws and regulations must be followed in addition to the requirements of this Policy. If any such local laws are not as strict as the terms of this Policy (including the laws and regulations referenced in it), then the terms of this Policy must be applied to the extent permitted by local law.

Any breach of this Policy may result in disciplinary action, or the cessation of the business relationship as appropriate. Moreover, it may constitute a criminal offence under applicable laws which could result in prosecution.

This Policy does not form part of any employee's contract of employment and Arena Sports Entertainment N.V may amend it at any time.

4. Definitions

4.1 Money Laundering (ML)

4.1.1 Money Laundering

ML can be defined as 'the process by which the proceeds of criminal activity are dealt with in a way to conceal or disguise their illicit criminal origins'.

Typically, ML consists of three stages:

- Placement: the physical disposal of criminal proceeds where the money launderer attempts to place cash into the financial system.
- Layering: the separation of criminal proceeds from their source by the creation of 'layers' or a sequence of transactions designed to disguise the audit trail and provide the appearance of legitimacy.

For further details on Arena Sports Entertainment N.V.'s enhanced due diligence procedure, please refer to Section 5.7 of this policy.

These procedures ensure transparency, mitigate money laundering risks, and align with AML licensing obligations for ongoing monitoring and regulatory reporting

5.4 Customer Risk Assessment

For Arena Sports Entertainment N.V., the customer is an individual who seeks to form, or who has formed a business relationship with the company.

The risk may vary in accordance with the type of customer, based on the customer's economic activity and/or source of wealth.

The risk assessment considers information held about the customer and seeks to ensure the information is consistent, and will be verified by one or more means.

As per Arena Sports Entertainment N.V.' risk approach, customers or business relationships with a perceived higher risk shall be placed under special surveillance and extended measures applied.

The commercial or professional relations, operations and transitions with persons from countries that do not fully implement international standards in countering money laundering shall be subject to special supervisions,

Where the operation or transaction does not have a reasonable economic justification or an apparently reasonable cause additional information on the circumstances surrounding the operation or transaction and its purpose shall be collected as far as possible.

Widely extended measures shall be mandatory applied in relation to customers who occupy or have held as senior state position known as Politically Exposed Persons, as well as to customers related to them.

The extensive measures with respect to these customers may be as follows:

- Making visits to the address specified by the client;
- Requiring additional documents and information from the client;
- Collecting information through another client;
- Online inquiries;
- Requirement of references by its counterparties in the country or abroad or by other obliged persons;
- Collection of information about the source of income;
- Verification of the client's activity, including by visiting his/her production or administrative premises or by collecting information from his counterparts; check with the client's employer;

- Measures contained in instructions issued by the director of the Financial Intelligence Directorate;
- Other measures deemed appropriate.

5.5 Customer Acceptance Policy

Based upon the customer risk assessment, the correct level of Customer Due Diligence can then be applied, taking into account all relatable risks.

5.6 Customer Due Diligence

5.6.1 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.

5.6.2 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.

5.6.3 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 identify 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.

5.7 Enhanced Due Diligence

EDD measures include CDD as described in Section 5.6 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.

5.8 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'.

5.8.1 Ongoing Monitoring and Review Frequency

Customer accounts shall be reviewed on a risk-sensitive basis based on the below parameters:

- High-risk customers shall be reviewed at annually
- Medium-risk customers shall be reviewed every two years
- Low-risk customers shall be reviewed every three years.

Trigger events such as unusual transaction activity, sanctions alerts, adverse media findings, or changes in customer profile will require immediate reassessment.

5.9 Reliance on Third Parties to Perform Customer Due Diligence

Using ID Verification/Fraud Prevention tools in order to check specific customers and verify ID documents. Some of the services offered by this tool are:

- Verifying ID cards/Driving license/International passports
- Access to terrorist database
- Address verification
- Telephone number verification

Once third-party verification or manual check has verified the identity of a customer, the verification is stored on the system.

5.10 Reporting of Suspicions and Unusual Transactions

5.10.1 Employee Responsibilities for Reporting

All client transactions will be subject to ongoing monitoring and review by the MRLO. Where the MRLO decides that a particular client or transaction should be subjected to additional investigation, employees are expected to comply with such investigations including the provision of additional information.

Employees, including the MRLO, are not expected to know or to establish the exact nature of any underlying criminal offence, or to know that the particular funds were definitely those arising from a crime or terrorist financing.

Any employee who has any suspicion of money laundering by a person with whom Arena Sports Entertainment N.V has any business dealings must immediately report the matter to the MRLO in writing with the full details of the suspicions. Having made such a report, the employee has then met their legal obligations under the regulations.

Examples of suspicious transactions are provided in Section 4.1.5 of this policy.

Any employee who is discovered to have failed to report a transaction, which they knew to be suspicious or to have potentially involved money laundering, will be subject to disciplinary action and will potentially be liable to prosecution unless the employee can provide just cause for not reporting the concerns to the MRLO. Employees are therefore encouraged to report all suspicions, no matter how slight, to the MRLO.

An employee may first discuss their suspicions with their Line Manager who may then accept responsibility for presenting the report to the MRLO. Any Line Manager who is approached by an employee to discuss a suspicious transaction or one known to involve money laundering must ensure that:

- The Line Manager makes a report to the MRLO, or;
- The Employee who made the approach reports to the MRLO, or;
- The Line Manager records their reasons for not making a report to the MRLO.

Any employee who has discussed a suspicious transaction or one known to involve money laundering with their Line Manager may choose to still file a report with the MRLO, even if the Line Manager has chosen not to do so.

All employees who handle investment transactions of any variety, including back office staff, will be provided with training in the recognition and handling of suspicious transactions. This training will ensure that all employees are aware of their individual responsibilities and have the confidence to follow the policy and procedures, as described in section 5.10.5 of this policy.

5.10.2 MRLO Responsibilities for Reporting

Upon receiving a report from an employee highlighting suspicious activity or a transaction potentially involving money laundering, the MRLO will decide whether or not to report the matter to the authorities.

The reporting of the suspicion of money laundering to the authorities is not a breach of duty or confidentiality to the client, but instead provides a safeguarding system for Arena Sports Entertainment N.V position.

If Arena Sports Entertainment N.V's MRLO decides that it is appropriate to report the matter, it must be reported to the relevant authority as soon as practicable.

Arena Sports Entertainment N.V's MLRO must record their decision to report or not to report and the reasons for their decision in writing, attaching any supporting documentation.

If a report is made, Arena Sports Entertainment N.V's MLRO must act in accordance with the relevant authority's instructions. In evaluating and determining whether to submit a SAR, the MLRO will consider, among other things:

- Details of the grounds for knowledge or suspicion of ML/FT;
- Any information in Arena Sports Entertainment N.V's possession that could be relevant, including customer due diligence information, knowledge of other parties involved and, where possible, whether the transactions concerned are in line with the relevant account's past activity, its purpose, profile, or normal course of business;
- Any information in the public domain that could be relevant, including negative news, political exposure, exposure to sanctions or the existence of prior investigations, etc;
- Further information obtained from the customer, if necessary. Any approach to the customer should be made sensitively and probably by someone already known to the customer, to minimise the risk of alerting the customer, or an intermediary, that a disclosure to the relevant authority is being considered.

5.10.3 Annual Report

The MRLO will conduct an annual review of Arena Sports Entertainment N.V systems and procedures in relation to ML and FT, and will prepare a report to the Board containing the findings. The report will include;

- An assessment of the company's compliance with its money laundering obligations and the effectiveness of the company's systems and controls;
- Indicate how new information or changes to protocol from the Government and other appropriate authorities in relation to money laundering has been reflected through the company's systems and controls in the past year;
- Presents the number of reports made by employees to the MRLO.

The Board will consider the report, and take any necessary steps to remedy deficiencies identified.

5.10.4 Blocking of Accounts

The freezing or blocking of accounts will be managed in accordance with the customers Term's and Conditions of play, the adherence to CDD and in line with Arena Sports Entertainment N.V policies and procedures for managing the risk of ML and FT.

5.10.5 Employee Training

All employees must be aware of their obligations and responsibilities relating to ML and TF.

All employees must be aware of who the current MLRO is.

Relevant employees must undergo AML/CTF training. AML/CTF training will be conducted face-to-face or online as appropriate and as part of broader compliance training. Employees must demonstrate that they have understood the requirements of this policy.

Arena Sports Entertainment N.V's must maintain a written record of all training provided and awareness measures taken.

5.10.6 Record Keeping and Audit Trail

Arena Sports Entertainment N.V maintains comprehensive and secure records of all AML/CFT related records such as customer transactions, due diligence documentation, and compliance activities

Records include include but are not limited to:

- customer due diligence documentation
- transaction records,
- sanctions screening results
- suspicious activity reports
- internal investigations
- training records

The records maintain a clear audit trail, linking each transaction to its corresponding compliance review and decision, enabling full traceability of AML processes. Our electronic systems incorporates tamper-proof logging and version control to preserve data authenticity.

These records are held for a minimum period required by applicable law, but not less than five years after the termination of the business relationship.

All records are securely stored and are immediately accessible for formal audit and regulatory review. Regular internal audits ensure that we consistently deliver to international AML best practices.

5.10.7 Governance and Oversight

Arena Sports Entertainment N.V has established a clear governance framework to ensure effective oversight of anti-money laundering (AML) obligations. This framework ensure defined lines of accountability, and escalation procedures to ensure timely decision-making.

Key roles and responsibilities are identified below:

The Board of Directors and senior management bear ultimate responsibility for the design, implementation, and ongoing effectiveness of the AML program.

A designated Compliance Officer and MRLO, independent from operational functions, shall oversee daily AML activities, including customer due diligence, transaction monitoring, and reporting obligations.

The Compliance Officer reports regularly to senior management and the Board on AML risks, controls, and regulatory developments, following a check-list to ensure transparency and Board oversight. The reporting checklist includes:

- Policy Approval
 - Review and formally approve the AML framework, including updates to reflect regulatory changes.
- Compliance Officer Appointment
 - Ensure adequate resources and reporting lines remain effective
- Risk Assessment Oversight
 - Approve periodic AML risk assessments covering customer profiles, products, and jurisdictions.
 - Update on the monitoring of emerging risks and mitigation strategies
- Reporting & Escalation
 - AML compliance reports (e.g., suspicious activity trends, audit findings).
 - Ensure escalation procedures are being followed.
- Training & Awareness
 - Verify AML training completion and effectiveness for staff, management, and board members.
- Audit & Review
 - Commission independent audits of AML systems and controls if required.
 - Review audit results and advise corrective actions.
- Regulatory Engagement
 - Oversee responses to regulatory inquiries and inspections.
- Continuous Improvement
 - Monitor effectiveness of AML controls.
 - Direct management to implement enhancements based on audit findings, regulatory updates, or industry best practices.

5.10.8 Independent Testing and Compliance Review

Arena Sports Entertainment N.V. conducts periodic independent reviews or audits of the AML/CFT framework to assess the effectiveness of internal controls, policies, procedures, sanctions screening measures, transaction monitoring systems, and employee compliance obligations.

These audits are conducted by qualified internal audit teams who are not involved in daily AML operations, thereby preserving objectivity.

The audits can include, but are not limited to reviews such as the below:

- Verify that the Board and senior management receive AML compliance reports.
- Check that customer identification records are complete and up to date.
- Review enhanced due diligence files for high-risk customers.
- Test automated monitoring thresholds and rules.
- Confirm alerts are generated, logged, and reviewed within required timeframes.
- Ensure SARs are filed promptly with relevant AML authorities.
- Review documentation supporting SAR decisions.
- Verify retention of all monitoring records, alerts, investigations, and reports for at least five years.
- Confirm audit trail integrity and accessibility.
- Check staff AML training records and completion rates.
- Assess training content for relevance and regulatory updates.

Findings including identified gaps or weaknesses are documented, presented to the Board of Directors and remediation actions decided, implemented and tracked immediately.

At the request of the Board, remedial actions can also be to employ an external audit company to assist us with our audit if required.

This independent oversight ensures that Arena Sports Entertainment N.V's AML controls remain robust, transparent, and responsive to evolving risks.

5.11 Anti-money Laundering Compliance Programme

Arena Sports Entertainment N.V's AML/CFT Programme is shaped by current applicable legislation, regulations and best-practice anti-money laundering standards and has been tailored to effectively manage and mitigate the ML and FT risks the organization is exposed to.

The programme includes establishing Board-approved policies, appropriate procedures and implementing and enforcing effective systems and controls such as those detailed within this policy.

6. Contact Information

Email: Customerservices@cyprussportingclubs.com

Tel: (+90) 392 815 815

Mobile: (+90) 533 820 0815

Fax: (+90) 392 815 6936

7. Policy URL

Link to URL on Website



(SMES) Solutions for Management and Employment Support N.V.

Managing Director

30.06.2026