

AML Policy Statement

The Elite Turf Club N.V.

May 26, 2025

In connection to the AML guidelines of CGA of January 17, 2025, the Company wishes to express the following.

The Company is offering services to a select and exclusive customer base, whereby the Company does not operate a URL. As such the Company does not offer retail-based services.

This results in specific processes and procedures that the Company uses to identify and verify the identity of each of her customers before entering into a relationship with the customer, As such, the Company wants to inform CGA that the identification of the customers is executed before the threshold of XCG4.000,- is reached.

Seen the specific nature of the business of the Company, the risk assessment of the Company is currently being updated.

The company is committed to adhere to local regulations and laws of Curacao in practising their services to customers of the group and to assist them with back-office services as they have done in the past for many years. In that light, currently the following AML policies and procedures are applicable to the Company:

- AML/CFT AML Manual
- Risk Assessment, CDD and Transaction Monitoring Policy
- AML Roles & Responsibilities
- AML Training Policy
- Risk Rating Calculator
- New Player Application Forms (Source of Funds, PEP, Account Use Etc.)