

THE ELITE TURF CLUB N.V.

Howard Johnson Hotel Plaza

Suite H-202

Willemstad, Curaçao

AML TRAINING POLICY

As a condition of continued employment, all of Elite's officers and employees are required to complete an annual AML training course. The current course, as selected by Elite's MLRO and approved by management, is offered through Vector Solutions, a leading IACET-accredited provider of risk management education. The course focuses on compliance with Title 31 of the Bank Secrecy Act, as well as best practices for filing Suspicious Activity Reports (SAR).