

AML POLICY OF BLACKSANDS B.V.

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1 INTRODUCTION

Hype.Bet is a brand name operated by BlackSands B.V., a company incorporated under the laws of Curaçao and registered with the Curaçao Chamber and Commercial under number 162520 and is located at Abraham de Veerstraat 1, Willemstad, Curaçao. BlackSands B.V. has obtained the gaming license number OGL/2024/985/0430 issued by Curaçao Gaming Authority.

References in this policy to "the Company", "We", "Us" or "Our" mean BlackSands B.V.

2 OBJECTIVE OF THE AML POLICY

We seek to offer the highest security to all of our users and customers on Hype.Bet. For that, a five-step account verification is implemented to ensure the identity of our customers. The reason behind this is to verify the accuracy of registered details and confirm that the payment methods used are legitimate and not associated with fraud, theft, or other misuse. The framework is built to effectively counter money laundering risks.

Hype.Bet also recognizes that nationality, geographic origin, payment, and withdrawal methods require varying levels of due diligence. We are committed to a risk-based approach and dedicate appropriate resources to controlling and mitigating ML/TF risks.

Hype.Bet adheres to high standards of anti-money laundering (AML) practices, following Curaçao's AML legislation, EU directives, and international guidelines. The Company requires its management and employees to uphold these standards in preventing misuse of its platform for money laundering.

3 DEFINITION OF MONEY LAUNDERING

- The conversion or transfer of property, especially money, knowing it is derived from criminal activity, to conceal its illegal origin or assist someone in evading legal consequences.
- The concealment or disguise of the true nature, source, location, disposition, movement, ownership, or rights of property derived from criminal activity.
- The acquisition, possession, or use of property knowing, at the time of receipt, it was derived from criminal activity.
- Participation in, aiding, abetting, facilitating, or counseling the commission of these actions.

These activities constitute money laundering even if the underlying criminal acts occurred in another jurisdiction.

4 AML GOVERNANCE

The board of directors of BlackSands B.V. is responsible for ensuring AML compliance on Hype.Bet. A designated Compliance Officer oversees the day-to-day implementation of AML measures.

5 AML POLICY CHANGES

Major changes to this AML policy are subject to approval by senior management of BlackSands B.V. and must align with regulatory expectations under the Curaçao Gaming Control Board (GCB).

6 KNOW YOUR CUSTOMER (KYC) and TRANSACTION MONITORING

Hype.Bet applies customer due diligence (CDD) and ongoing monitoring measures required by law. A risk-based approach is used to understand the nature and purpose of customer relationships and to create tailored customer risk profiles.

7 KYC PROCESS INCLUDES

- Collecting baseline data (wallet address, email, IP, country, etc.)
- Verifying wallet legitimacy using blockchain analytics
- Screening users against global sanctions lists
- Collecting full identification and address documentation as needed

8 IDENTITY VERIFICATION

A third-party service provider supports Hype.Bet in verifying KYC information, age, and geographic location. Users are also screened against sanctions lists and for residence in prohibited jurisdictions.

Customer Information:

We collect and maintain relevant details including wallet address, name, date of birth, country, and postal code.

9 ENHANCED DUE DILIGENCE (EDD):

EDD is triggered for:

- Suspicious behavior or flagged red flags
- High-volume transactions
- Users from high-risk jurisdictions or PEPs
- Sanction list alerts

EDD includes collection of:

- Full legal name and address
- Government-issued ID with a photo
- Source of Funds and Source of Wealth

10 REFUSAL POLICY

Hype.Bet will block or deny access to users who:

- Do not provide required identification
- Provide forged or misleading documents
- Attempt to mask location
- Are listed on international sanctions lists
- Originate from restricted jurisdictions

11 TRANSACTION MONITORING

Hype.Bet uses both in-house and third-party monitoring systems to:

- Flag unusual transaction sizes or patterns
- Detect attempts to fund accounts from high-risk jurisdictions
- Monitor every deposit/withdrawal using blockchain forensics (e.g. Chainalysis)

11.1 CHAINANALYSIS INTEGRATION

All crypto deposits and withdrawals are reviewed using Chainalysis risk scores. Suspicious activity results in suspension and may require SoW documentation.

Red Flag Indicators Include:

- Use of mixing services or privacy coins
- Sudden spikes in activity
- Transactions inconsistent with user profiles

12 SANCTION SCREENING

Wallet addresses are screened before issuance and during ongoing use. Users attempting to fund accounts via known sanctioned exchanges will be blocked or reviewed.

13 WITHDRAWAL TRESHOLD KYC

Once a user reaches a predefined withdrawal threshold, regardless of prior verification, additional KYC and SoW verification may be required.

14 TRAINING

Hype.Bet provides periodic AML/CFT and sanctions compliance training for relevant staff.

15 REPORTING

Suspicious or unusual activity will be reported to the FIU Curaçao using the goAML platform. Users linked to money laundering, terrorism financing, or listed sanctions will be reported and potentially blocked.

Contact:

For inquiries regarding this AML and KYC policy, please contact: support@hype.bet