Cash-Wagering Business Description and Cash Risk Management Framework

Red Lane B.V.

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1. Introduction

Red Lane B.V. is an online gaming operator incorporated in Curaçao and operating under the trading name "Red Lane". The Company offers remote gambling services through its online gaming platform, including Online Casino, Live Casino, Sportsbook, Virtual Sports, and promotional gaming activities.

The Company operates exclusively through digital channels and does not maintain any land-based casino, betting shop, gaming hall, or physical wagering location. All gaming transactions, customer registrations, deposits, wagering activity, and withdrawals are processed through the Company's online platform.

The Company's primary target market is Turkey and all services are provided exclusively to adult customers who satisfy the applicable legal age requirements and successfully complete the Company's customer verification procedures.

2. Nature of Cash-Wagering Activities

The Company's cash-wagering business consists of customers depositing funds into their gaming accounts for the purpose of participating in gambling activities offered on the platform.

The wagering lifecycle consists of:

Stage 1 – Customer Registration

Customers create an online account by providing:

- Full legal name
- Date of birth
- Residential address
- Nationality
- Email address
- Telephone number

All customers must successfully complete identity verification before being permitted to access wagering services.

Stage 2 – Funding of Account

Customers may fund their accounts through approved payment methods including:

- Visa
- Mastercard
- Bank Transfer
- Cryptocurrency (where permitted)

All deposits are subject to AML/CFT screening and transaction monitoring controls.

Stage 3 – Gaming Activity

Customers may participate in:

- Online Casino Games
- Live Casino Games
- Sports Betting Events
- Virtual Sports
- Promotional Campaigns

The Company continuously monitors gameplay activity to identify unusual or potentially suspicious behavior.

Stage 4 – Withdrawal of Funds

Customers may request withdrawal of available balances.

Prior to processing withdrawals, the Company performs:

- Account verification review
- Payment method verification
- Transaction history review
- AML risk assessment
- Source of Funds review where applicable

3. Jurisdictions and Geographic Application

The Company currently intends to focus its commercial activities on Turkey.

Prior to entering any additional market, Red Lane B.V. will conduct:

- Legal assessment
- Regulatory assessment
- AML/CFT risk assessment
- Sanctions review
- Commercial viability assessment

No services will be intentionally offered in jurisdictions where online gambling activities are prohibited or restricted.

4. Target Markets and Customer Demographics

The Company targets adult recreational players aged 18 years and above (or higher age limits where legally required).

Target customer categories include:

- Recreational casino players
- Sports betting customers
- Live casino players
- Mobile gaming users

The Company does not target:

- Minors

- Politically exposed persons as a customer segment
- High-risk customers
- Customers located in sanctioned jurisdictions

5. Jurisdictional Restrictions and Geo-Blocking Controls

Red Lane B.V. implements multiple controls to restrict access from prohibited jurisdictions.

These controls include:

Geolocation Controls

- IP address verification
- Country detection software
- Geolocation databases

VPN and Proxy Detection

The Company utilizes technical controls designed to identify:

- VPN usage
- Proxy services
- TOR network access
- Location masking technologies

Restricted Jurisdictions

Access may be restricted or blocked where:

- Local laws prohibit online gambling
- International sanctions apply

- Elevated AML/CFT risks exist
- Regulatory requirements cannot be satisfied

Customers identified as residing in prohibited jurisdictions will be prevented from registering or transacting on the platform.

6. Cash Risk Management Policy

6.1 Risk Management Objectives

The primary objective of the Company's Cash Risk Management Framework is to identify, assess, monitor, and mitigate risks arising from:

- Money laundering
- Terrorist financing
- Proliferation financing
- Fraud
- Payment abuse
- Identity theft
- Criminal misuse of gambling services

6.2 Customer Risk Assessment

Each customer is assigned a risk rating based on:

Customer Factors

- Occupation
- Source of income
- PEP status
- Adverse media exposure

Geographic Factors

- Country of residence
- Country of payment origin
- FATF risk classification

Transaction Factors

- Deposit volume
- Withdrawal volume
- Frequency of transactions
- Payment methods used
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Product Risk

- Casino activity
- Sports betting activity
- Cryptocurrency usage

Customers are classified as:

- Low Risk
- Medium Risk
- High Risk

6.3 Cash Transaction Monitoring

The Company continuously monitors:

- Deposits
- Withdrawals
- Gameplay activity
- Bonus utilization
- Payment patterns

Automated alerts are generated for:

- Unusual transaction patterns

- Rapid deposits and withdrawals
- Minimal gameplay activity
- Structuring attempts
- Third-party payment activity

6.4 Source of Funds Controls

Source of Funds verification may be required where:

- Significant deposit volumes are detected
- High-risk indicators are identified
- Customer behavior is inconsistent with expected profile

Acceptable evidence may include:

- Bank statements
- Payslips
- Tax returns
- Business ownership documentation
- Asset sale agreements

6.5 Enhanced Due Diligence

EDD is applied to:

- Politically Exposed Persons
- High-risk customers
- Customers from high-risk jurisdictions
- High-value players
- Cryptocurrency users

EDD measures include:

- Enhanced identity verification
- Source of Wealth verification
- Senior management approval
- Enhanced transaction monitoring

6.6 Compliance Oversight

The Company's AML/CFT framework is overseen by:

MLRO: Marika Dumbadze

The MLRO is responsible for:

- AML compliance oversight
- Suspicious activity investigations
- STR reporting
- Regulatory liaison
- AML training and awareness
- Periodic compliance reviews

6.7 Suspicious Activity Reporting

Where suspicious activity is identified:

1. Activity is escalated to the MLRO.
2. The MLRO conducts an investigation.
3. Relevant documentation is collected.
4. A determination is made regarding reporting obligations.
5. Suspicious Transaction Reports are submitted to the Financial Intelligence Unit (FIU) through the goAML reporting platform where required.

6.8 Ongoing Review

The Cash Risk Management Framework is reviewed annually and whenever:

- New products are introduced;
- New jurisdictions are entered;
- Material operational changes occur;
- Regulatory requirements are amended; or
- New AML/CFT risks are identified.

Red Lane B.V. remains committed to maintaining a robust and effective risk management framework designed to ensure the integrity of its cash-wagering operations and compliance with all applicable regulatory requirements.