KE International Limited N.V. - AML & CTF Policy

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Confidential - AML & CTF & CPF Policy

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Revision History

Version No	Date	Reason and Changes Made	Updated By	Approved By
1.0	15/12/2022	Issued	Compliance	MLRO
1.1	01/02/2024	Updates include Geo- Blocking of high-risk locations *(Section 11)* and withdrawals during KYC procedures *(Section 15).*	Compliance	MLRO
1.2	04/03/2025	Policy rewrite and update in line with new AML rules on advice of Corporate Director (May 2024)	Compliance Officer (TM)	The Board

KE International Limited N.V. - AML & CTF Policy

1. Definitions & Abbreviations

This section provides key definitions and abbreviations used throughout the policy to ensure clarity and consistency in AML compliance.

- **AML** – Anti-Money Laundering
- **CTF** – Counter-Terrorist Financing
- **CPF** – Counter Proliferation Financing
- **EDD** – Enhanced Due Diligence
- **KYC** – Know Your Customer
- **FATF** – Financial Action Task Force
- **FIU Curaçao** – Financial Intelligence Unit of Curaçao
- **SAR** – Suspicious Activity Report
- **MLRO** – Money Laundering Reporting Officer
- **VASP** – Virtual Asset Service Provider

2. Introduction

KE International Limited N.V. ("KE International") is committed to implementing a risk-based approach to detect, deter, and prevent Money Laundering (ML), Terrorist Financing (TF), and Proliferation Financing (PF) activities. This policy follows FATF's 40 Recommendations and applies to all jurisdictions where KE International operates B2B services. Additionally, KE International adheres to Curaçao's legal framework, including the National Ordinance on Money Laundering (P.B. 1993, no. 52), the National Ordinance on Reporting Unusual Transactions (NORUT), the National Ordinance on Identification when Rendering Services (NOIS), and all relevant AML/CFT regulations issued by the Centrale Bank van Curaçao en Sint Maarten (CBCS) and the Curacao Gaming Authority (CGA). Curaçao is a member of the Caribbean Financial Action Task Force (CFATF), which adheres to FATF's international standards. This policy integrates both CFATF principles and applicable Curaçao AML laws to ensure a robust compliance framework.

KE International ensures full compliance with these requirements through due diligence, enhanced due diligence (EDD) on high-risk clients, and timely suspicious activity reporting (SARs) to FIU Curaçao. KE International employs Lexco's risk-scoring mechanisms to assess the overall risk profiles of operators, ensuring compliance obligations are met while reaffirming that transaction monitoring remains the responsibility of operators.

3. Policy Statement

KE International strictly complies with AML, CTF, and CPF regulations to mitigate financial crime risks. This policy applies to all employees, directors, officers, and departments, ensuring adherence to compliance standards. All employees must complete AML/CTF awareness training upon onboarding, followed by annual refresher courses. Departments involved in onboarding and risk assessment must implement stringent compliance procedures, ensuring that these do not extend to direct transaction monitoring, as this remains the responsibility of operators.

4. Summary of Policies in Place

This section provides an overview of the core policies that KE International has implemented to mitigate financial crime risks and ensure full AML compliance. These policies establish a framework for due diligence, risk management, and regulatory adherence across all operations. To ensure comprehensive AML compliance, KE International has implemented the following policies:

- **Risk Management Policy** – Identifies and categorizes financial crime risks, applying appropriate mitigation strategies.
- **Customer Due Diligence (CDD) Policy** – Ensures verification of operator identity, UBO screening, and transaction risk assessment.
- **Enhanced Due Diligence (EDD) Policy** – Applies additional scrutiny to high-risk operators and jurisdictions.
- **Transaction Monitoring Policy** – Requires operators to have their own transaction monitoring frameworks.
- **SAR Reporting Policy** – Outlines the process for filing reports with FIU Curaçao.
- **Record-Keeping & Audit Policy** – Ensures AML-related documents and reports are retained for a minimum of five years.

5. Allocation of Responsibilities

5.1 Board Level Accountability

The Board oversees strategic AML compliance and ensures annual risk assessments and policy reviews are conducted. Key responsibilities include:

- Approving and overseeing the annual AML risk assessment.
- Ensuring sufficient resources for compliance functions.
- Reviewing audit results and ensuring corrective actions are taken.

5.2 Money Laundering Reporting Officer (MLRO)

The MLRO (Megan Sponneck) is responsible for:

- Implementing AML compliance under KE International's Curaçao B2B licenses.
- Conducting risk assessments and policy development.
- Overseeing SAR reporting and liaising with FIU Curaçao.
- Submitting regulatory reports and ensuring independent testing of AML procedures.

6. Legal and Regulatory Framework

KE International aligns its AML framework with the May 2024 AML & CFT Guidelines issued by Curaçao's Gaming Control Board (GCB) and the Multilateral Memorandum of Understanding (MMoU) between the Centrale Bank van Curaçao en Sint Maarten (CBCS), the GCB, and FIU Curaçao. These guidelines require EDD on high-risk customers, stricter KYC procedures, and reinforced SAR reporting to FIU Curaçao.

7. Risks Surrounding Financial Crime & Mitigating Tools

Financial crime presents significant risks to KE International's operations, particularly in the areas of Money Laundering (ML), Terrorist Financing (TF), and Proliferation Financing (PF). These threats can arise from inadequate due diligence, weak transaction monitoring by operators, and exposure to high-risk jurisdictions.

The primary risks include:

- **Money Laundering (ML):** The misuse of gaming platforms by illicit actors to integrate, layer, or extract illegally obtained funds.
- **Terrorist Financing (TF):** The funneling of funds through gaming channels to support terrorist activities.
- **Proliferation Financing (PF):** The risk of financial services being exploited to fund the development or distribution of weapons of mass destruction (WMDs).

Mitigation Strategies Implemented in this Policy:

- Enforcing **stringent KYC and UBO verification** at onboarding to ensure transparency in ownership structures.
- Applying a **risk-based approach** to customer due diligence (CDD) and enhanced due diligence (EDD) for high-risk operators and jurisdictions.
- Implementing **contractual obligations** requiring operators to have strong transaction monitoring and AML programs.
- Prohibiting **transactions from FATF blacklisted jurisdictions** and conducting enhanced reviews for operators linked to high-risk countries.

- Ensuring **regular engagement with FIU Curaçao** to keep up with regulatory changes and best practices.
- Mandating **ongoing monitoring of operator compliance** through periodic risk assessments.

These measures ensure that KE International remains compliant with Curaçao's AML/CFT regulations while mitigating exposure to financial crime risks within its B2B operations. KE International recognizes the risks associated with Money Laundering (ML), Terrorist Financing (TF), and Proliferation Financing (PF). The primary risks include:

- **ML:** Concealing the origins of illegally obtained money through operator accounts.
- **TF:** The use of gaming platforms to move illicit funds to support terrorist activities.
- **PF:** The risk of financial services being misused to support weapons of mass destruction proliferation.

Mitigation Strategies:

- Strict KYC and UBO verification.
- Risk-based approach to onboarding and ongoing monitoring.
- Prohibiting transactions from FATF blacklisted jurisdictions.
- Regular engagement with FIU Curaçao to ensure compliance updates.

8. Key Compliance Requirements

8.1 Customer Due Diligence (CDD) & Enhanced Due Diligence (EDD)

KE International requires all operators to undergo a CDD process before onboarding. This includes identity verification, UBO checks, and risk classification. **EDD is triggered in the following cases:**

- Operators from high-risk jurisdictions.
- Transactions flagged as unusual or suspicious.
- Where there is a suspicion of fraud or money laundering.

Mitigation factors for EDD include increased documentation requirements, higher scrutiny on fund sources, and periodic compliance audits.

8.2 Transactions Involving Fiat & Crypto

KE International recognizes that some of its monthly invoiced operators prefer to make payments in cryptocurrency instead of fiat. While the company does not currently hold a cryptocurrency wallet, it is in the process of establishing one to facilitate cryptocurrency payments, primarily in USDT and other selected digital assets. Once received, all cryptocurrency funds will be promptly converted into fiat currency and transferred to the company's designated bank account to mitigate volatility risks and ensure financial stability.

Although KE International does not operate as a Virtual Asset Service Provider (VASP), it acknowledges the regulatory importance of ensuring transparency and compliance when handling cryptocurrency transactions. The company is committed to aligning its processes with AML/CTF best practices, including key elements of the Financial Action Task Force (FATF) Travel Rule, which requires the collection and sharing of identifying information for cryptocurrency transactions above a specified threshold.

9. Compliance and Enforcement

Failure to comply with this policy may result in disciplinary action, including termination of employment and potential legal consequences. KE International remains dedicated to maintaining a strong compliance culture, ensuring that all employees and stakeholders uphold the highest standards of financial integrity and regulatory adherence.

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By: eMoore N.V. – Managing Director
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