

AML Policy

- Anti-Money Laundering Requirements

- Media Gate N.V. Company (the "Company") is a company registered and incorporated in Curaçao with registration number 135910(0) and license number: 8048/JAZ.
- We are further authorized to accept and transact with customers in either legal currency, crypto currency (digital/virtual), or a combination of both.
- We are committed to preventing our systems from being used for all crimes, including money laundering and terrorist financing. This includes the implementation of the following measures:

- General Rules

- We are fully committed to the prevention of money laundering and the application of measures to combat terrorist financing. We are also fully committed to our social obligation to prevent our systems from being used as a means to commit crimes.
- We are committed to keeping up-to-date with the latest information to prevent money laundering and terrorist financing in order to protect our business and our dignity.
- Our policies and procedures are in place and continually updated to ensure compliance with rules relevant to our business.

- Laws and Regulations

- We are under the compliance control of Media Gate N.V. Company.
- We are required to comply with all applicable laws and regulations in the jurisdiction of Curaçao, including criminal laws, identification for services, identification at the time of service, and national ordinances covering the reporting of unusual transactions.
- As a service provider of gaming, including gambling, we are required to have appropriate and fair practices and procedures in place to prevent our systems from being used to finance money laundering or terrorist criminal activities.

- Customer Due Diligence

- We apply appropriate customer due diligence as required by law, including the use of identifiers.
- As part of our customer registration process and customer management, we perform due diligence checks such as verifying name, age, nationality, place of residence, PEP, and sanctions history.
- If a customer's risk profile falls under a "red flag" indicating high risk, we will conduct enhanced due diligence, including verification based on personal documents, publicly available data, privileged information from various sources, financial or corporate data, and third party data providers.

- We are obligated to manage and monitor all customer relationships in accordance with industry best practices, international recommendations and guidelines.
- Suspicious transactions or situations that may be related to money laundering or terrorist financing will be reported to the relevant law enforcement agencies.
- If due diligence checks are not completed, all transactions will be suspended or paused until all checks are completed.

- **Crypto Currency Trading**

- We reserve the right to perform additional background and security checks on customers who wish to deposit or withdraw via crypto currency. In case of doubt, we reserve the right to suspend a customer's account and request additional due diligence documentation.
- If the identity of the customer or the source of funds cannot be verified, the Management Committee and the service provider will be informed and reviewed to make a final decision.
- If a decision is made to cease doing business with a customer, any funds retained by the customer will be held in a seized funds account and declared as part of a suspicious activity report submitted to law enforcement.

- **Reporting Suspicious Activity**

- As a Curacao eGaming IP licensee and Financial Intelligence Unit (FIU) registrar, we are obligated to report unusual or suspicious transactions in accordance with national ordinances.
- If a customer is discovered or confirmed to be involved in sanctioned listings, money laundering, terrorism financing, or other criminal activity, we must file a formal report with law enforcement authorities regarding the suspected activity.