

1 AML PROCEDURES

1.1 AML Detection

Withdrawals can be requested for amounts that have been turned over at least once. This protects VIP SPORTSBOOK from being abused for money laundering purposes, and also protects our system from free-of-charge deposits that may be abused to our disadvantage. All withdrawal requests are initially checked, which monitors all the withdrawal requests and denotes those which are suspicious, based on any suspected fraudulent background. Each customer will only be able to deposit a maximum \$1,200 per week. Players who wish to deposit more funds than the initial set limit will have to go through a more sufficient verification process with voice confirmation, and will be monitored on a regular basis on gaming activity. Further, these players will be highlighted/tagged in our software back office, for easier identification, monitoring and control.

Apart from the automatic controls by the system, all transactions/customer accounts are checked for multiple accounts, individuals which may have been blacklisted by any relevant organisation or company, transaction and betting behaviour, handled amounts, deposit/withdrawal methods and other things that may lead to any suspicious activity based on the long term experience of our related employees.

If no such issues are encountered, this finding will be forwarded to our accounting department for a last check and the final payout can take place. This process is completed within one working day.

1.2 AML Reporting

In any cases where VIP SPORTSBOOK encounters and verifies that any form of anti-money laundering is taking place or being attempted, such activity will be reported to the Curaçao Gaming Authorities, as required.

2 KYC PROCEDURES

2.1 Player Registration

In order to open an account with VIP SPORTSBOOK from the web portal, a user must first complete the registration process and deposit some funds, with which he/she can then start playing. The registration details to be filled in by all new customers include the first and last name, address, country of residence, date of birth, e-mail address, and account currency. All customers must be at least 18 years old and can only have one player account in their name, as specified in the Remote Gaming Regulations of Curaçao. Therefore, no minors can play on VIP SPORTSBOOK website. Users which do not have a registered player account will not be allowed to play.

2.2 Due Diligence

Players from restricted countries/states are not allowed to register due to the strict non-gambling regulations in their country. These countries are also included in the Terms and Conditions so that the

players can be aware of such restrictions prior to registration. Prior to any withdrawals, the following documentation will be requested from the customer: proof of bank account, credit card, utility bill (not older than 3 months) and I.D. Card. Such documentation must be verified prior to approval of withdrawal. Furthermore, voice and phone number verification will be performed on high volume customers, and customers with severe irregularities in their betting behavior. All documentation will be requested formally through emails for both due diligence scenarios, and filed in order with internal company procedures.

Upon cumulative withdrawal by any customer of €2,300 or more, he/she will be obliged to send a proof of identity in the form of scanned documents such as scans of the I.D. Card or passport to confirm their identity, and in certain cases, a recent bill to confirm their address.

No cumulative withdrawals of €2,300 or more will be processed until these documents are sent by the customer requesting the withdrawal, and are checked and confirmed by the Fraud Management staff.

Whenever a new customer deposits money and starts playing/betting on VIP SPORTSBOOK website, his/her transactions and betting behavior will be checked and monitored by our system on a daily basis. This procedure enables us to analyze the way every individual customer uses the products from our websites, making it possible to categorize the players and thus set limits to the individual players according to their betting patterns.

2.3 Email Verification

When a new account is created, a verification link is sent to the email account specified during the registration process. When the user clicks on the link, the account is then successfully created. Only at this point can the player deposit money and start placing bets.