

(ENGLISH VERSION)

1- Anti-Money Laundering (AML) Policies and Procedures

1.1 - Introduction

SA Sports Group America N.V is licensed and regulated by the Government of Curaçao, to offer remote (online) games over the internet, under the Remote Gaming Regulations. Under the license conditions issued by Curacao Authorities, SA Sports is required to have in place adequate measures to prevent its systems from being used for the purposes of money laundering, terrorist financing or any other criminal activity. SA Sports is therefore obliged to follow the provisions contained in the legal framework namely Proceeds of Crime Act 2002 (Part 7), and The Money Laundering, Terrorist Financing and Transfer of Funds (information on the payer) Regulation no. 692 of 26 of June of 2017 and any guidance notes issued by the relevant Authorities.

1.2 - Objective of the Policy

SA Sports is fully committed to be constantly vigilant to prevent money laundering and combat the financing of terrorism in order to minimize and manage risks such as the risks to its reputational risk, legal risk and regulatory risk. It is also committed to its social duty to prevent serious crime and not to allow its systems to be abused in furtherance of these crimes. The company will endeavor to keep itself updated with developments both at national and international level on any initiatives to prevent money laundering and the financing of terrorism. It commits itself to protect, at all times, the organization and its operations and safeguards its reputation and all from the threat of money laundering, the funding of terrorist and other criminal activities.

1.3 - Money laundering guidelines and disclosure requirements

- a. The user identification is a requirement for using the services. Anonymous use of the Services is prohibited and therefore discarded.
- b. For the initial verification of the player account it is necessary to send of such documentation
 - Proof of identity (RG, CNH or Passport)
 - Proof of residence (water, electricity, gas or telephone bill)
 - Selfie of the account holder having in hand and legibly: the identification document (the same one that was sent separately) and a sheet with the name of the website and the date of submission of the image.
 - Submitting all of these items is mandatory for the account validation process to take place.
- c. At any time, without any reasoning required, SA Sports may request proof of your identification, and may also request proof of your residence and bank details. Finally, SA Sports may require a copy of such documents to be stored in the respective database.
- d. If the mandatory identification required by SA Sports is not fulfilled, SA Sports has the right to block the account and only pay the deposited funds after fulfilling the requirements for the correct identification of the user.
- e. If the user's identification does not occur within 90 days from the sending of the request notification by SA Sports, carried out by e-mail using the last address updated by the user,

SA Sports has the right to retain any deposited amounts and, if necessary, notify the competent authorities.

f. In order for the user to be able to request withdrawals, he must have wagered 100% of the amount deposited in cash in his account. If the player has not placed bets that add up to the total value, the withdrawal will be rejected.

g. This procedure complies with the international rules on money laundering, which are widely incorporated by SA Sports.

1.4 - Obligations

- SA Sports will indicate a Money Laundering Reporting Officer (MLRO) whose responsibilities will include the duties required by the laws regulations and guidance notes. (Contact through the email contato@betesporte.com)

- All instances of suspected Money Laundering attempts must be reported to the MLRO, but that suspicion must not be conveyed to the customer and further actions must await consents. The MLRO is then responsible for liaising with, submitting Suspicious Activity Reports and seeking consents from the responsible legal authority in the jurisdiction where the transaction was done, when appropriate. He will also ensure that appropriate registers are kept for all related reporting.

- Take reasonable steps to establish the identity of any person for whom it is proposed to provide its service.

- SA Sports will implement a FULL 'Know Your Customer' (KYC) policy. This will assist in tackling not just Money Laundering threats but other fraud threats generally. Customers will be advised at registration and generally on the supporting non-transactional website that Company will utilize online verification tools and that in instances where we are not able to satisfy criteria, ID and address verification documents will be requested.

- Keep at all times a secure online list of all registered Players.

- Retain identification and transactional documentation as defined in the laws regulations and guidance notes.

- The business will also not have any cash element to it, mitigating risks associated with counterfeit monies.

- Systems will be operating to record all transactions for an account. These account histories will be subject to a program of regular and continual checks against fraud and social responsibility indicators. Where unusual bet patterns and winning patterns are detected, these will also be cross-referenced to call history to ensure that staff are not colluding with customers or acting illicitly.

- SA Sports will also keep a register of those customers that it identifies as high risk or politically exposed. Those accounts will be subject to greater scrutiny and frequency of checks.

- In general, where illegal or inappropriate behavior by staff is identified, investigatory and disciplinary procedures will follow those outlined in staff contracts as required by employment law directives and the need to use in greater propensity, measures such as suspension when for example transactional fraud is suspected and those activities form a standard part of an employee's job description.

- All transactions carried out on our site may be controlled to avoid money laundering or terrorist financing activities. Suspicious transactions will be reported to the relevant authority, depending on the jurisdiction governing the transaction.

- If our risk and fraud department suspects fraud, it may require the player to provide appropriate documentation. If there is enough evidence of fraudulent behavior (eg bank repudiation, account operated by third parties, use of forged documents, fraud of means of payment, etc.), the account will be suspended until the situation is cleared. The suspension shall be communicated to the relevant authority together with the respective grounds (evidence or evidence collected) within 24 hours and to the authorities responsible for criminal proceedings. Parallel to the suspension, SA Sports may proceed to the immobilization, as a precautionary measure, of the balance of the player account, until the decision of the competent authorities.

- Provide initial and ongoing training to all relevant staff, including, but not limited to:

- Staff personal responsibilities;
 - 1.4.1 Procedures in respect of identifying Players;
 - 1.4.2 Monitoring Player activity;
 - 1.4.3 Record-keeping;
 - 1.4.4 Reporting any unusual/suspicious transactions;
 - 1.4.5 Unusual Betting Patterns;
 - 1.4.6 Suspicious deposit and withdrawal patterns (size and frequency);
 - 1.4.7 Reliability of Card Data;
 - 1.4.8 Customer verification issues and Identity Theft;
 - 1.4.9 Account linkage/multiple accounting;
 - 1.4.10 High Risk Jurisdictions;
- 1.4.11 Client due diligence (CDD), including enhanced requirements for high risk clients, which includes PEPs;
 - 1.4.11.1 Ensure that this policy is developed and maintained in line with evolving statutory and regulatory obligation and advice from the relevant authorities.
 - 1.4.11.2 Examine with special attention, and to the extent possible, the background and purpose of any complex or large transactions and any transactions which are particularly likely, by their nature, to be related to money laundering or the funding of terrorism.
 - 1.4.11.3 SA Sports may terminate Accounts with immediate effect and retain all account funds in the event of a credible suspicion of fraudulent activity including, but not limited to, the supply of fraudulent, forged, altered or stolen personal data and, still, in the case of multiple account registration.
 - 1.4.11.4 Report any suspicion or knowledge of money laundering or terrorist financing to the Financial Intelligence Analysis Unit (FIAU) set up by law as the Government Agency responsible for the collection, collation, processing, analysis and dissemination of information with a view to prevent money laundering and combat the funding of terrorism.
 - 1.4.11.5 Suspicious Activity in this case is being referred to as suspicious transactions, extreme player profiles, when deposits are not matching up amongst other elements. Other concrete examples of how we identify players who require our team to undertake a risk monitoring approach of our customers and when to specifically carry out enhanced due diligence checks on the Player Profiles can be further required:
 1. Passport or ID card.
 2. Utility bill.
 3. Bank statement.
 4. Other proof of identity.

- 1.4.11.6 The Enhanced Due Diligence Checks are subject to players' profile and the amount of Risk they pose to us. Only when we determine some of the above points or a combination of a few will we flag the customer/customers in question and conduct risk monitoring. This will include checks of where the customer works, value of house, where the customer lives and checks to see whether the value of the house is logical compared to the customers spending.
- 1.4.11.7 Within that framework, Suspicious Activity Reports (SARs) are an imposed requirement. SA Sports ensures that any employee reports to the Risk Team where they have grounds for knowledge or suspicion that a person or customer is engaged in ML or terrorist financing. Any employee failing to do so is open to criminal prosecution.
- 1.4.11.8 Escalations of SARs should be done in a confidential, discreet manner, in a handwritten form and not via email so as to ensure maximum anonymity.
- 1.4.11.9 An employee must not, under any circumstances, disclose or discuss any AML concern with the person or persons subject to an investigation, or any other person for that matter. Disclosure (also known as "tipping off") is strictly prohibited and carries with it very serious legal penalties.
- 1.4.11.10 Furthermore, and in order to keep ourselves protected as much as possible, no remark should ever be left on an account that would give any indication that ML is suspected, a player being entitled, at any point in time, to request the full notes/remarks on their account.
- 1.4.11.11 Cooperate with all relevant administrative, enforcement and judicial authorities in their endeavor to prevent and detect criminal activity.
- 1.4.11.12 Moreover, the company shall:
1. Not accept to open anonymous Accounts or Accounts in fictitious names such that the true beneficial owner is not known.
 2. Not accept cash from Players.
 3. Funds may be received from Players only by any of the following methods: credit cards, debit cards, electronic transfer, wire transfer, cheques and any other method approved by the Regulator.
 4. Not register a Player who is under eighteen (18) years of age.
 5. Only register a single account in the name of a particular person: multi-account practices are strictly prohibited.
 6. Transfer payments of winnings or refunds back to the same route from where the funds originated, where possible.
 7. Not accept a wager unless a User Account has been established in the name of the Player and there are adequate funds in the Account to cover the amount of the wager.
 8. Not accept a wager unless the funds necessary to cover the amount of the wager are provided in an approved way.
 9. Not accept Players residing or playing from non-reputable jurisdictions.
 10. Not make a payment in excess of two thousand three hundred EUR (€ 2,300) or cumulative out of a User Account to a Player until the Player's identity, age, and place of residence have been verified.
 11. If no transaction has been recorded on a User Account for thirty months, close the User Account and remit the balance in that account to the Player, or if the Player cannot be satisfactorily located, to the regulator.

12. Where it deems necessary, verify creditworthiness of the Player with third parties who previously provided any information on the Player.
13. If it becomes aware that a person has provided false information when providing due diligence documents, not register such person. Where that person has already been registered, the company shall immediately cancel that person's registration as a Player with the company.

- The customer declares and expressly guarantees that all the amounts deposited and used to participate in www.betesporte.com come from legitimate sources and are not connected with any fraudulent activity, money laundering or activities that are considered to be illicit by law such as money laundering or funding of terrorism. Pursuant to the current law, and regulations which may be issued at any time by the regulator about the prevention of money laundering and the funding of terrorism, SA Sports reserves the right to take any steps it considers necessary to comply with these requirements. The users cannot use loans to participate in SA Sports website, www.betesporte.com, as the operator, will not grant the user any kind of loan or mechanism that allows them to take out loans or transfer funds between players, at any time. SA Sports reserves the right to supervise any transfer of funds that are deposited or withdrawn by any user and to report any user information to the regulatory or criminal authorities and/or payment service providers. SA Sports keeps the players' money in an account which is legally separate from SA Sports's own funds. And also reserves the right to retain all a customer's funds at its own criteria if it considers that they derive directly or are related with illicit or fraudulent activities. After confirmation of the deposit, the customer can use the deposited funds for bets. The deposits are credited to the player's account as soon as the bank transfer is successfully validated. Deposits and withdrawals are only made in United States Dollar (US\$), Brazilian real (R\$) and Euro (€). The minimum deposit amount is 10 USD or 30 BRL or 10 EUR. It is the customer's entire responsibility to check whether their bank imposes any fees on these transfers. The client declares that is the holder of the payment account provided to SA Sports and the payment methods used are associated with that same account, or if not possible, associate it to an account owned by the client. The total balance of your player account includes Casino Balance, Real Sportsbook Balance, Casino Bonus Balance and Sportsbook Bonus Balance. The existence of two wallets (casino and sports betting) does not change the behavior of your player account when making an withdrawal request. Consequently, making a request of withdraw, regardless the balance to be withdrawn is transferred from your casino wallet, it may result in the loss or cancellation of sports betting bonuses. The withdrawals must be made by the same method as that used for the deposits whenever the method used allows it. If the deposit method does not allow withdrawals, these must be made by bank transfer to the account given by the user when they registered or to the payment account they indicated and hold and that is chosen for this purpose. Withdrawals may only be processed from your Sports Cash Account. Any withdrawals from your Casino Cash Account can only be made by first transferring your withdrawal amount to your Sports Cash Account and then requesting the withdrawal be processed from the Sports Cash Account. Please note however that any transfer of funds from the Casino Cash Account to the Sports Cash Account will be considered a Withdrawal from the Casino Cash Account and may consequently result in the forfeiture or voidance of Casino product bonuses and promotions. SA Sports reviews players spend and game play to check for suspicious activity. Before any withdrawal is processed the following procedures are carried out:

1. The customer's deposit history is reviewed to confirm that no suspicious payments have been made to the customer's account. The frequency of deposits and the sum of deposits are reviewed to ensure they are within normal range for the customer based on his depositing history and the general depositing range throughout our network.
2. The customer's turnover is reviewed to ensure that they have played in the casino and are not using SA Sports as a method to move money.

3. When possible, funds must always be refunded back to the original payment method used by the player to make a deposit. In order to fulfil the legal requirements your identity must be verified by SA Sports. For this purpose, at the first time of the withdrawal request you should send us an email to www.betesporte.com with at least the following documents:
 1. Document of your identity with photo and date of birth;
 2. Proof of address;
 3. Proof of ownership of the account.

- Whenever you pretend to change your payment's account you must send a new proof of the ownership of the new account. Without that your payment won't be processed. Your Player Account shall not be used or treated as a bank account. In case of deposits or withdrawals without gaming activity, or activity using reduced proportions of initial deposits, SA Sports reserves the right to request explanations before transferring the withdrawal request in question. Your withdrawal request will be cancelled within 72 hours from the date of your order if you don't give to www.betesporte.com the necessary information to allow verification of your identity. Any withdrawal is free.

1.5 - Politically exposed person

- European guidelines regarding "The Prevention of Laundering the Proceeds from Criminal Activity (Money Laundering) and Terrorism Financing" entered into effect, changing the definition of politically exposed person. In order to minimize corruption and money laundering risks, SA Sports is obliged by law to collect data and identify which of the clients/clients' beneficiaries should be considered as politically exposed persons, their family members or close associates. According to the law "On the Prevention of Laundering the Proceeds from Criminal Activity (Money Laundering) and Terrorism Financing" the following person shall be deemed a politically exposed person (hereinafter referred to as PEP): a person who holds or has held a prominent public position in a country of the European Union or European Economic Area or a third country, including senior-level state official, head of a state administrative unit (municipality), head of the government, minister (deputy minister or assistant deputy minister if there is such position in a relevant country), secretary of state or another high level official in the government or state administrative unit (municipality), member of parliament or similar legislative body, member of the management body (board) of a political party, judge of constitutional court, supreme court, or another level court (member of judicial body), member of the council or board of a supreme audit institution, member of the council or the board of a central bank, ambassador, charge d'affaires, armed forces higher officer, member of the council or board of a state capital company, head (director, deputy director) of international organization and member of the board or a person who holds an equal position at such organization. The following person shall be deemed a family member of a politically exposed person:

- 1.5.1 a spouse or person considered to be the equivalent to a spouse. A person may be deemed the equivalent to a spouse only provided that he / she has such status under the laws of the respective country;
- 1.5.2 a child or a child of a politically exposed person's spouse or person considered to be the equivalent to a spouse, his / her spouse or person considered to be the equivalent to a spouse;
 - 1.5.3 a parent, grandparent or grandchild;
 - 1.5.4 a brother or sister.

- A close associate of a politically exposed person is an individual publicly known to maintain business or other close relationship with a politically exposed person, or to be a shareholder in

one and the same commercial company with a PEP, and also an individual who is the sole owner of such legal entity which is known to be actually established for the benefit of a PEP.

1.6 - Forbidden Countries

- The following countries are restricted from participation with www.betesporte.com :

1.6.1 United States of America and its territories, French Republic and its territories, United Kingdom, Netherlands (including Curacao and other countries and territories that form part of the Kingdom of Netherlands), Portugal, Spain, Germany, Denmark, Slovenia, Turkey, Poland, Czech Republic, Singapore, Democratic People's Republic of Korea (DPRK), Syria, Iran, Pakistan, Iraq, Laos PDR, La Reunion, Martinique, Yemen.