

Anti-Money Laundering Policy

Titans Games N.V.

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1. Introduction

1.1. Titans Games N.V. is licensed and regulated by the Government of Curacao to offer online games under the regulations of remote games. Under the conditions of the License issued by the Curacao Authorities, Titans Games N.V. is required to adopt appropriate measures to prevent its systems from being used for money laundering, terrorist financing or any other criminal activity. Therefore, Titans Games's bound by the law to follow the provisions contained in the most important legislations on the subject, namely the Proceeds of Crime Act 2002 (Part 07) and The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulation no. 692 Regulations 2017 and any guidance notes issued by the relevant authorities.

2. Policy objective

2.1. Titans Games is fully committed to being constantly vigilant to prevent money laundering and combat terrorist financing in order to minimize and manage risks such as reputational risk, legal risk and regulatory risk. The company is also committed to its social duty to prevent serious crimes, not allowing its systems to serve as a promotion for its commission.. To this end, it undertakes to make every possible effort to keep up to date with developments at national and international level on any initiatives to prevent money laundering and terrorist financing and to protect the organization and its operations from the threat of money laundering, financing of terrorist activities and other criminal activities, thus safeguarding its reputation.

3. Obligations

3.1. Appoint one of its senior officers as the designated *Money Laundering Reporting Officer* (MLRO) whose responsibilities will include the duties required by the legal regulations and guidance notes.

3.2. All instances of suspected Money Laundering attempts must be reported to the *Money Laundering Reporting Officer* (MLRO), but that suspicion must not be conveyed to the customer and further actions must await consents.

3.2.1. The *Money Laundering Reporting Officer* (MLRO) is responsible for the liaising, 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.

3.3. Take reasonable steps to establish the identity of any person to whom to offer the service.

3.4. Titans Games N.V. will implement a 'Know Your Customer' policy. This will assist in tackling not only money laundering threats, but other fraud threats in general.

3.4.1. Customers will be notified at the time of registration and usually at the non-transactional website supporting, which the Company will use online verification tools and that in cases where they are not able to satisfy the criteria, identification and address verification documents will be requested.

3.5. Keep a secure online list of all registered Players.

3.6. Retain identification and transactional documentation as defined in regulatory laws and guidance notes..

3.7. The business will also not have any cash element, mitigating risks associated with counterfeit money.

3.8. The systems will be operating to record all transactions of an account. These account records will be subject to a program of regular and continual checks against fraud and social responsibility indicators. If unusual betting patterns and winning patterns are detected, these will also be crossed and recorded to ensure that the staff is not conspiring with customers or acting illicitly.

3.9. Titans Games N.V. will also keep a record of customers it identifies as high risk or politically exposed. These accounts will be subject to thorough verification and frequent monitoring.

3.10. In general, when illegal or inappropriate behavior by employees is identified, the investigative and disciplinary procedures described in the Labor Contracts will be followed, as required by the guidelines of labor legislation.. There may be a need to use, with greater propensity, measures such as suspension when fraud is suspected. These activities constitute a standard part of an employee's job.

3.11. All transactions carried out on our website will be controlled to avoid money laundering or terrorist financing activities. Suspicious transactions will be reported to the relevant authority of the respective jurisdiction.

3.12. In cases of suspected fraud, the Department of Risk and Fraud may require the player to provide additional documentation.

3.12.1. If there is sufficient evidence of fraud, the account will be suspended until the situation is clarified.

3.12.2. The suspension shall be reported to the competent authority and the authorities responsible for criminal proceedings with the respective grounds within 24 hours.

3.12.3. Parallel to the suspension, Titans Games N.V. may proceed to the immobilization of the balance of the player account, as a precautionary measure, , until the decision of the competent authorities.

3.13. Provide initial and ongoing training to all relevant employees, including but not limited to:

3.13.1. (i) Player identification procedures; (ii) monitoring Player activity; (iii) record-keeping; (iv) reporting any unusual and /or suspicious transactions; (v) reporting any unusual betting patterns; (vi) reporting suspicious deposit and withdrawal patterns (size and frequency); (vii) verification of the reliability of the Player's Card Data; (viii) analysis of customer verification problems and identity theft; (ix) linkage analysis between accounts/multiple ledgers; (x) accountable to high-risk jurisdictions and (xi) Customer Due Diligence, including enhanced requirements for risky customers.

3.14. Ensure that this policy is developed and maintained in accordance with evolving legal and regulatory obligations and the advice of competent authorities.

3.15. Rigorously examine the background and purposes of any complex or large transactions and any transactions likely to be related to money laundering or terrorist financing.

3.16. Titans Games N.V. may terminate Accounts immediately and retain all account funds in the event of suspected fraudulent activity, including but not limited to providing fraudulent, falsified, altered or stolen personal data and in case of registration of multiple accounts.

3.17. Report any suspicion or knowledge of money laundering to terrorist financing to the competent authority of its jurisdiction.

3.18. Suspicious Activity in this case is being referred to as suspicious transactions, extremist player profiles, when deposits are not matching up amongst other elements.

3.18.1. The following documents may be required during the verification of Players suspected of fraud or suspicious behavior: (i) passport or ID card; (ii) utility bill (water or electricity, etc); (iii) bank statement and (iv) other evidence of identity.

3.19. More detailed due diligence checks are conditional on player profiles and the risk of conduct they present. Only when suspicious conduct is verified or the sum of it, the customer will be signaled on the issue and the arrangements exercised.

3.19.1. Arrangements include but are not limited to: verification of the player's workplace, place of residence and compatibility with their bets.

3.20. Suspicious Activity Reports are mandatory. Any employee who fails to do so is open to criminal prosecution.

3.21. Suspicious Activity Reports shall be made confidential to ensure maximum anonymity.

3.21.1. An employee must not, under any circumstances, disclose or discuss any Anti-Money Laundering Policy concern with the person or persons subject to an investigation, or any other person. Disclosure (also known as "tipping off") is strictly prohibited and carries with it very serious legal penalties.

3.22. Observations shouldn't be left on a player's account that indicates that they are suspected of irregular and/or fraudulent behavior.

3.23. Cooperate with all relevant administrative, enforcement and judicial authorities in their endeavor to prevent and detect criminal activity.

3.24. Moreover, the company shall:

3.24.1. Not accept opening anonymous accounts or fictitious accounts in which the true beneficiary is not known.

3.24.2. Not accept cash from Players.

3.24.3. Funds should only be received from Players by the following methods: credit cards, debit cards, wire transfer, bank transfer and any other method approved by the Regulator.

3.24.4. Not register Players under eighteen (18) years old.

3.24.5. Only register a single account in the name of a particular person: multi-account practices are strictly prohibited.

3.24.6. Transfer payments of winnings or refunds back to the same route from where the funds originated, where possible.

3.24.7. Not accept a bet 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 bet.

3.24.8. Do not accept a bet unless the funds required to cover the bet has already been approved.

3.24.9. Not accept Players residing or playing from non-reputable jurisdictions.

3.24.10. Do not make a payment in excess of three hundred euros (€ 300) for a Player until he has verified identity, age and place of residence.

3.24.11. 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.

3.24.12. If necessary, verify the Player's creditworthiness with third parties who previously provided any information about the Player.

3.24.13. If the Company becomes aware that a person has provided false information in the due diligence process, it should not be registered. If the person has already been registered, the company will immediately cancel that person's registration as a Player.

4. Values, transactions, and regulations

4.1. The customer expressly declares and warrants that all amounts deposited and used to participate in online games come from legitimate sources and are not linked to any fraudulent activity, money laundering or activities that are considered unlawful.

4.2. 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, Titans Games N.V. reserves the right to take any steps it considers necessary to comply with these requirements.

4.3. The users cannot use loans to participate in Titans Games N.V. website.

4.3.1. Titans Games N.V. will not grant the user any type of loan or mechanism that allows him to make loans or transfer funds between Players at any time.

4.4. Titans Games N.V. 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.

4.5. Titans Games N.V. keeps Players' money in an account that is legally separate from Titans Games N.V.' own funds. It also reserves the right to retain all of a client's funds at its own discretion if it considers that they derive directly or are related to illicit or fraudulent activities.

4.6. After confirmation of the deposit, the customer can use the deposited funds for bets. The deposits are credited to the player's account once the bank transfer is validated.

4.7. Deposits and withdrawals can only be made in Real (R\$), Dollar (US\$) and Euro (€).

4.8. It is the customer's entire responsibility to check whether their bank imposes any fees on these transfers.

4.9. The customer declares that is the account holder provided to the Titans Games N.V. and that the payment methods used are associated with that same account.

4.10. The Player's total account balance includes the Casino Balance, the Real Sportsbook Balance, Casino Bonus Balance, and Sports Betting Bonus Balance.

4.11. The existence of two wallets (Casino and Sportsbook) does not change the behavior of the player's account when making a withdrawal request, which may result in the loss or cancellation of Sportsbook or Casino bonuses, regardless of the balance to be withdrawn.

4.12. Withdrawals should be made by the same method used for deposits, where possible. If the deposit method does not allow withdrawals, these must be made by bank transfer to the account given by the Player when registered or to the indicated payment account.

4.13. Titans Games reviews Players and checks for suspicious activity periodically. Before any withdrawal be processed, the following procedures shall be performed:

(i). Customers' deposit history is analyzed to confirm that there are no suspicions of payments that have been made to the customer's account. The frequency of deposits and the sum of deposits is reviewed to ensure they are within the normal range for the customer, based on their deposit history and the overall range of deposits across our network.

(ii). The customer's trading volume is reviewed to ensure that they have effectively played on the site and that they are not using the platform as a method to transfer money.

(iii). In order to comply with the legal requirements for withdrawal, the Player must attach at least one of the following documents on the platform for verification by Titans Games N.V.: a) Identity; b) Proof of address; or c) Proof of account ownership.

4.14. The Player who wishes to change their payment account will be required to provide proof of ownership of the new account, under penalty of being unable to process the payment.

4.15. The Player Account must not be used or treated as a bank account.

4.16. In case of deposits or withdrawals without gambling activity, Titans Games N.V. reserves the right to request explanations to the Player before transferring the withdrawal request in question.

4.17. The Player's withdrawal request will be canceled within 72 hours from the date of order if Titans Games N.V. is not provided with the necessary information to enable identity verification.

5. Politically Exposed Person

5.1. In order to minimize corruption and money laundering, Titans Games N.V. is required by law to collect data and identify which of its customers and/or customers' beneficiaries should be considered Politically Exposed Persons, their family members, or close associates.

5.2. According to the law to prevent money laundering and combat terrorist financing the following person shall be deemed a Politically Exposed Person:

- (i). a person who holds or has held a prominent public position in a country or economic area, including a high-level state official;
- (ii). head of a state administrative unit (municipality);
- (iii). head of government;
- (iv). minister (deputy minister or assistant deputy minister if there is such position in a relevant country);
- (v). secretary of state or another high-level official in the government or state administrative unit (municipality);
- (vi). member of parliament or similar legislature;
- (vii). member of the management agency (council) of a political party;
- (viii). judge of constitutional court, supreme court or another court (member of judiciary);
- (ix). member of the council or board of a supreme audit institution;
- (x). member of the council of a central bank;
- (xi). ambassador;
- (xii). armed forces senior officer;
- (xiii). member of the council of State Company;
- (xiv). head (director, deputy director) of an international organization and member of the board or a person who holds an equal position at such organization.

5.3. The following person shall be deemed a family member of a Politically Exposed Person:

- (i). a partner or person considered equivalent to a partner. A person may be considered equivalent to a partner only if he/she has such status under the laws of the respective jurisdiction;
- (ii). a child of a Politically Exposed Person's partner or person considered to be the equivalent to a partner;
- (iii). parents, grandparents or grandchildren of a Politically Exposed Person;
- (iv). sister or brother of a Politically Exposed Person.

5.4. A close associate of a Politically Exposed Person is an individual publicly known for maintaining business or other close relationship with a Politically Exposed Person, or for being a shareholder in the same trading company with a Politically Exposed Person.

6. Forbidden Countries

6.1. The following countries are prevented from participating in the services offered by Titans Games: United States of America and its territories, Aruba, Bonaire, Curacao, France, The Netherlands, Saba, Statia, St. Maarten, Singapore, Iran, North Korea, Albania, Barbados, Botswana, Cambodia, Jamaica, Haiti, Mauritius, Myanmar (Burma), Nicaragua, Pakistan, Panama, South Sudan, Syria, Yemen, and Zimbabwe.