

Anti-Money Laundering (AML) Policy

Swiftbet – www.swiftbet.bet

Operated by Tirpsmon Limited

Contact: support@swiftbet.bet

1. Policy Statement

Tirpsmon Limited (“the Company”), the owner and operator of the online betting platform Swiftbet (www.swiftbet.bet), is committed to the highest standards of anti-money laundering (AML) compliance. This policy outlines the procedures and controls implemented to prevent Swiftbet from being used as a conduit for money laundering or terrorist financing, in accordance with Kenyan law, including the *Proceeds of Crime and Anti-Money Laundering Act (POCAMLA)* and relevant guidelines issued by the Financial Reporting Centre (FRC) and the Betting Control and Licensing Board (BCLB).

2. Objectives

The main objectives of this policy are to:

- Prevent and detect any money laundering or terrorist financing activities.
- Ensure compliance with all AML-related legal and regulatory requirements.
- Establish clear procedures for customer due diligence (CDD), suspicious activity monitoring, and reporting.
- Promote a culture of compliance and integrity within Swiftbet.

3. Legal Framework

This policy is guided by:

- The *Proceeds of Crime and Anti-Money Laundering Act, 2009 (POCAMLA)*;
- The *Anti-Money Laundering and Combating the Financing of Terrorism Guidelines*;
- Regulations issued by the *Financial Reporting Centre (FRC)*;
- Guidelines from the *Betting Control and Licensing Board (BCLB)*;

- International best practices, including the *Financial Action Task Force (FATF)* recommendations.

4. Customer Due Diligence (CDD)

Swiftbet will implement risk-based Customer Due Diligence measures, including:

4.1. Know Your Customer (KYC) Procedures

- Verification of identity (full name, national ID or passport number, date of birth).
- Verification of contact information (email, phone number, residential address).
- For corporate accounts: company registration details, director and UBO information.

4.2. Enhanced Due Diligence (EDD)

- Applied to high-risk customers (e.g., politically exposed persons, users with irregular betting behavior).
- Includes additional documentation and source of funds/wealth checks.

5. Ongoing Monitoring

- Continuous transaction monitoring using automated and manual tools to identify suspicious behavior such as:
 - Unusually large deposits or withdrawals;
 - Rapid turnover of funds without legitimate betting activity;
 - Use of multiple accounts or third-party transactions.
- Account reviews are conducted periodically and in response to red flags.

6. Suspicious Transaction Reporting (STR)

- All suspicious transactions will be reported to the Financial Reporting Centre (FRC) without tipping off the customer.
- Internal reports must be submitted to the Swiftbet Compliance Officer immediately upon identification of suspicious activity.

- STRs are documented and retained for at least seven (7) years.

7. Record Keeping

Swiftbet will maintain comprehensive records of:

- Customer identification documents;
- Transactions and betting activity;
- Correspondence relating to AML concerns;
- Internal and external reports for a minimum of seven (7) years.

8. Training and Awareness

- Mandatory AML training will be provided to all employees, especially those in customer service, compliance, and finance.
- Training includes identification of suspicious transactions, CDD procedures, and reporting obligations.
- Refresher training is conducted at least annually.

9. Compliance Officer

- Swiftbet has appointed a dedicated AML Compliance Officer responsible for:
 - Implementing this AML policy;
 - Liaising with regulatory bodies;
 - Maintaining records and filing reports;
 - Monitoring the effectiveness of AML procedures.

10. Risk Assessment

- Swiftbet conducts periodic risk assessments to identify and mitigate AML risks related to customer types, payment methods, jurisdictions, and services offered.
- AML procedures are updated based on risk findings and regulatory changes.

11. Policy Review

This policy will be reviewed annually or whenever there is a significant change in legislation, regulatory requirements, or business operations.

Approved by:

Tirpsmon Limited – Compliance Department

Effective Date: May 1, 2025

Contact Email: support@swiftbet.bet