

## **Anti-Money Laundering (AML) and the Countering the Financing of Terrorism (CFT)**

Our AML and CFT policies require that ShootPoker implement a risk-based approach to identify, assess, and mitigate potential financial crime risks. We will conduct business-wide and individual customer risk assessments to determine the potential for money laundering or terrorist financing. High-risk factors include large cash transactions, customers who are Politically Exposed Persons (PEPs), or those from high-risk jurisdictions. Our Systems must be in place to monitor all customer transactions and betting patterns for unusual or suspicious activities, such as large deposits with minimal play, rapid withdrawals, or transactions designed to avoid reporting thresholds.

We accept that we are legally required to report any suspicious activity or transactions to the relevant Financial Intelligence Unit (FIU) promptly, and that all customer identification details, transactions, risk assessments, and SAR filings must be maintained for a period of 5 years for audit purposes. The designated and appointed AML compliance officer (Money Laundering Reporting Officer or MLRO) will oversee the compliance program and report to senior management. All relevant staff must receive ongoing, mandatory training to recognise and respond to potential money laundering activities and red flags. We invite regular independent testing or audits of the AML program to ensure its effectiveness and regulatory compliance.

## **Knowing your Customers (KYC)**

Every player will need to provide their identity, along with a mobile number, and that mobile number will be verified using our geolocation software. If acceptable, an electronically generated code will be sent to each new applicant's mobile phone. They will be asked for their date of birth at this point. Once complete, the new applicant will be permitted to use our free-to-use tables, which have no fiscal winners or losers. However, players must provide further personal information, including name, written confirmation of their date of birth, address, and a government-issued ID, before the customer can gamble or deposit significant funds on other 'tables'.

'Avatars' and 'Angles' will be used to hide the players' true Identities, but they will be index-linked to their true identities. For high-value or high-risk customers, ShootPoker will conduct checks to verify the legitimacy of funds used for gambling. We are obligated to perform Customer Due Diligence, an ongoing process that involves continually monitoring customer activity to ensure it is consistent with their risk profile and expected behaviour.

## **Responsible Gaming Policies (RGP)**

ShootPoker, the corporate entity, commonly known as 'The house', have introduced several measures to prevent problem gambling. Whilst protecting vulnerable individuals, we may occasionally ask our systems to conduct affordability assessments to ensure our players are not gambling beyond their means, especially for those who show indicators of harm. We have also provided tools for players to set deposit, spending, and time limits, or to self-exclude from the platform. We will implement systems to identify and engage with players who may be developing problem gambling behaviours, based on their play patterns or spending. Our objective will always be to provide a safe, well-balanced, and mindful gaming environment.