KYC/AML Policy

Know Your Customer & Anti-Money Laundering

Last Updated: November 2, 2025

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1. Introduction

OverBet Gaming is committed to preventing money laundering, terrorist financing, and other financial crimes. This KYC/AML Policy outlines our procedures for verifying the identity of B2B partners and ensuring compliance with international standards.

2. Regulatory Framework

Our KYC/AML procedures comply with:

• Financial Action Task Force (FATF) Recommendations

• Anjouan Offshore Finance Authority regulations

• International gaming industry standards

• Applicable local laws and regulations

3. Customer Due Diligence (CDD)

3.1 Standard Due Diligence
For all B2B partners, we collect and verify:

Business Information:

• Legal name and trading names

• Business registration number

• Registered address

• Nature of business

• Gaming license details

Beneficial Owners:

• Full name and date of birth

• Nationality and residence

• Government-issued ID (passport, driver's license)

• Proof of address (utility bill, bank statement)

• Source of funds documentation

Authorized Representatives:

• Identity verification

• Proof of authorization

3.2 Enhanced Due Diligence (EDD)
Enhanced procedures apply to:
• High-risk jurisdictions
• Politically Exposed Persons (PEPs)
• High-volume or high-value transactions
• Complex ownership structures

4. Verification Process

4.1 Documentation Requirements

Partners must provide:

- **Certificate of incorporation**
- **Articles of association**
- **Gaming license (certified copy)**
- **Proof of registered address**
- **Organizational chart showing beneficial ownership**
- **Bank account verification**
- **Source of funds declaration**

4.2 Verification Methods

- **Document authentication**
- **Third-party database checks**
- **Sanctions list screening**
- **PEP screening**
- **Adverse media checks**

5. Ongoing Monitoring

We conduct continuous monitoring including:

- Regular review of partner accounts (annually or more frequently)
- Transaction monitoring for suspicious activity
- Updates to beneficial ownership information
- License validity checks
- Sanctions list screening updates

6. Risk Assessment

Partners are assigned risk ratings based on:

- Jurisdiction risk level
- Business type and complexity
- Transaction volumes and patterns
- Ownership structure
- Compliance history

Risk ratings determine the level of due diligence and monitoring frequency.

7. Suspicious Activity Reporting

We report suspicious activities including:

- Unusual transaction patterns
- Attempts to avoid reporting thresholds
- Transactions with no apparent business purpose
- Use of multiple accounts for unclear reasons
- Reluctance to provide required information

Suspicious Activity Reports (SARs) are filed with relevant authorities as required.

8. Record Keeping

We maintain records for a minimum of 7 years, including:

• All KYC documentation
• Transaction records
• Risk assessments
• Correspondence and communications
• Due diligence reports

9. Training and Awareness

Our staff receives regular training on:

• AML/KYC regulations and procedures
• Recognizing suspicious activity
• Reporting obligations
• Data protection and confidentiality

10. Sanctions Screening

We screen all partners and their beneficial owners against:

• OFAC (Office of Foreign Assets Control) sanctions lists
• UN Security Council sanctions lists
• EU sanctions lists
• UK HM Treasury sanctions
• Other relevant national and international sanctions

11. Politically Exposed Persons (PEPs)

Enhanced due diligence applies to PEPs, including:

• Senior government officials
• Political party leaders
• High-ranking military officers
• Senior executives of state-owned enterprises
• Close family members and associates of PEPs

12. Consequences of Non-Compliance

Failure to comply with KYC/AML requirements may result in:

• Suspension of services
• Termination of partnership
• Reporting to regulatory authorities
• Legal action

13. Contact Information

For KYC/AML inquiries, contact:

Compliance Officer: compliance@overbetgaming.com

AML Reporting: aml@overbetgaming.com

OverBet Gaming

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