



## ANTI-MONEY LAUNDERING POLICY

**Effective Date:** 07<sup>th</sup> of April, 2025

**Last Updated:** 07<sup>th</sup> of April, 2025

At **3XC Gaming Limited**, we are committed to preventing the use of our platform for money laundering, terrorist financing, and any other illicit financial activity. This Anti-Money Laundering (AML) Policy outlines the procedures and internal controls we have put in place to detect, deter, and report suspicious activity in compliance with applicable laws and best practices.

### 1. Policy Objective

This policy is designed to:

- Ensure our services are not used to facilitate money laundering or terrorist financing.
- Establish robust procedures for verifying player identity and monitoring transactions.
- Report suspicious activities to relevant authorities where required.
- Promote awareness and training among employees and partners.

### 2. Scope

This AML policy applies to:

- All users and account holders of 3XC Gaming platforms.
- All games, tournaments, and services offered by 3XC Gaming Limited.
- All employees, agents, and contractors acting on behalf of 3XC Gaming Limited.

### 3. Customer Due Diligence (CDD) & KYC

We implement a **Know Your Customer (KYC)** procedure for all users before allowing full access to gaming services, including:

- **Identity Verification:** Full name, date of birth, address, and valid government-issued ID.
- **Age Verification:** Confirming that all users are 18+ or the legal age of gaming in their jurisdiction.
- **Address Verification:** Via utility bill or bank statement, where necessary.
- **Ongoing Monitoring:** Regular checks to ensure the information remains accurate and up to date.

Enhanced Due Diligence (EDD) may be applied in high-risk scenarios, such as:

- Large or irregular deposits/withdrawals

- Users from high-risk jurisdictions
- Inconsistent transactional behavior

#### 4. Transaction Monitoring

We monitor player activity to identify patterns consistent with money laundering, including:

- Rapid movement of large funds in and out of accounts
- Use of multiple accounts or third-party deposits
- Structuring transactions to avoid thresholds
- Frequent deposits with minimal gameplay

Suspicious activity is flagged for internal review and, if necessary, escalation to the relevant authorities.

#### 5. Reporting Suspicious Activities

In accordance with applicable regulations, we will file **Suspicious Transaction Reports (STRs)** with local law enforcement or financial intelligence units if we suspect a transaction may be linked to money laundering or other financial crime.

#### 6. Record Keeping

We maintain comprehensive records of:

- KYC documentation
- Deposit and withdrawal history
- Communication logs
- Internal review actions

These records are retained for a minimum of **5 years** in compliance with local regulations.

#### 7. Employee Training

All staff involved in operations, support, compliance, and payments are regularly trained on:

- AML obligations and procedures
- How to identify and report suspicious behavior
- Data protection and confidentiality

#### 8. Third-Party Payments

To reduce risk, **we do not accept or process payments from third-party accounts**. All deposits and withdrawals must originate from accounts held in the name of the registered player.

#### 9. Sanctions and Prohibited Jurisdictions

We do not allow users from countries subject to international sanctions or known for high money laundering risk. We regularly update our list of **restricted jurisdictions** to remain compliant with global AML regulations.



## 10. Policy Review

This AML policy is reviewed periodically and updated to reflect:

- Changes in applicable laws and regulations
- Operational changes within 3XC Gaming
- Emerging risks and industry best practices

