

GENERAL AML/KYC POLICY

1. This Anti-Money Laundering and Know Your Customer Policy (hereinafter - the “AML/KYC Policy”) of Allbebet OÜ (hereinafter “Allbebet”), company registered in Estonia, registry number 14548670 at Harju maakond, Tallinn, Põhja-Tallinna linnaosa, Randla tn 13-201, 10315, reflects main provisions of Allbebet compliance policies designated to prevent and mitigate possible risks of Allbebet being involved in any kind of illegal activity.

2. Both international and local regulations require Allbebet to implement effective internal procedures and mechanisms to prevent money laundering, terrorist financing, drug and human trafficking, proliferation of weapons of mass destruction, corruption and bribery and to take action in case of any form of suspicious activity from its Users.

VERIFICATION PROCEDURES

3. One of the international standards for preventing illegal activity is customer due diligence (“CDD”). According to CDD, Allbebet establishes its own verification procedures within the standards of anti-money laundering and “Know Your Customer” frameworks.

4. Allbebet identity verification procedure requires the User to provide Allbebet with reliable, independent source documents, data or information (e.g., national ID, international passport, bank statement, utility bill). For such purposes Allbebet reserves the right to collect User’s identification information for the AML/KYC Policy purposes.

5. Allbebet will take steps to confirm the authenticity of documents and information provided by the Users. All legal methods for double-checking identification information will be used and Allbebet reserves the right to investigate certain Users who have been determined to be risky or suspicious.

6. Allbebet reserves the right to verify User’s identity in an on-going basis, especially when their activity seemed to be suspicious (unusual for the particular User). In addition, Allbebet reserves the right to request up-to-date documents from the Users, even though they have passed identity verification in the past.

7. User’s identification information will be collected, stored, shared and protected strictly in accordance with the Allbebet Privacy Policy and related regulations.

8. Once the User’s identity has been verified, Allbebet is able to remove itself from potential legal liability in a situation where its Services are used to conduct illegal activity

COMPLIANCE OFFICER

9. The Compliance Officer is the person, duly authorized by Allbebet, whose duty is to ensure the effective implementation and enforcement of the AML/KYC Policy. It is the Compliance Officer's responsibility to supervise all aspects of Allbebet anti-money laundering and counter-terrorist financing, including but not limited to;

a) Collecting Users' identification information.

b) Establishing and updating internal policies and procedures for the completion, review, submission and retention of all reports and records required under the applicable laws and regulations.

c) Monitoring transactions and investigating any significant deviations from normal activity.

d) Implementing a records management system for appropriate storage and retrieval of documents, files, forms and logs.

- e) Updating risk assessment regularly.
 - f) Providing law enforcement with information as required under the applicable laws and regulations.
10. The Compliance Officer is entitled to interact with law enforcement, which are involved in prevention of money laundering, terrorist financing and other illegal activity.

ANTI-MONEY LAUNDERING POLICY

11. Allbebet enforces a strict anti-money laundering policy with zero tolerance for money laundering activities. We define money laundering as any activity that is carried out in an attempt to misrepresent the source of funds actually acquired through illegal processes as funds that were acquired through lawful sources/activities.

12. All Allbebet affiliates are obligated to comply with this anti-money laundering policy and internal AML Manuals and with all applicable anti-money laundering laws. Failure to comply can result in severe consequences such as criminal penalties and heavy fines.

13. Allbebet ensures complete compliance with laws pertaining to anti money laundering through its related policy.

14. Allbebet implements a range of filtration operations for swift and accurate identification of any financial activities that may constitute or are related to money laundering. This helps ensure a money laundering-free financial operations throughout the Allbebet Platform.

15. All Allbebet Users acknowledge, undertake and agree to the following terms regarding their use of Allbebet, opening and maintenance of accounts at Allbebet and for all financial transactions as a Allbebet client:

- The User will comply (throughout the time as an Allbebet client) with all relevant statutes pertaining to money laundering and proceeds from criminal activities.
- Allbebet operates under certain obligations known as “know-your-client” obligations which grant Allbebet the right to implement anti-money laundering procedures to help detect and prevent money laundering activities where money laundering may mean to handle any funds associated with any illegal activity regardless of the location of such activity.
- The User agrees to lend full cooperation to Allbebet with respect to anti-money laundering efforts. This involves providing information that Allbebet requests regarding the User’s business details, account usage, financial transactions etc. to help Allbebet perform its duties as dictated by Applicable laws regardless of jurisdiction.
- Allbebet reserves the right to delay or stop any funds transfer if there is reason to believe that completing such a transaction may result in the violation of any applicable law or is contrary to acceptable practices.
- Allbebet reserves the right to suspend or terminate any account or freeze the funds in an account if there is reason to believe that the account is being used for activities that are deemed unlawful or fraudulent. Allbebet has the right to use User’s information for the investigation and/or prevention of fraudulent or otherwise illegal activities.
- Allbebet has the right to share User’s information with:
 - a) Investigative agencies or any authorized officers who are helping Allbebet comply with applicable law, including anti-money laundering laws and know-your-client obligations;

- b) Organizations that help Allbebet provide the services it offer its Users;
- c) Government, law enforcement agencies and courts;
- d) Regulatory bodies and financial institutions.

16. Activities that Allbebet considers possible indications of money laundering include:

- The User showing unusual apprehension or reservations about Allbebet's anti-money laundering policies.
 - The User's interest in conducting financial transactions which are contrary to good business sense or are inconsistent with the User's business policy.
 - The User failing to provide legitimate sources for their funds.
 - The User providing false information regarding the source of their funds.
 - The User having a history of being the subject of news that is indicative of civil or criminal violations.
 - The User seems to be acting as a 'front man' for an unrevealed personality or business, and does not satisfactorily respond to requests for identifying this personality or business
 - The User not being able to easily describe the nature of his/her industry.
 - The User frequently makes large deposits and demands dealing in cash only.
 - The User maintains multiple accounts and conducts an unusually high number of inter-account or 3rd party transactions.
 - The User's previously usually inactive account starts receiving a surge of wire activity.
- The above list is by no means an exhaustive list. Allbebet monitors its User and account activity in light of several other red flags and takes appropriate measures to prevent money laundering.

KNOW YOUR CUSTOMER (KYC)

17. The User acknowledges that he/she/it has to complete a KYC check for the Use of the Website, which must be in form and substance satisfactory to the Company. KYC check is carried out after completing of the registration at the website by providing necessary information with regard to identification of the User, beneficial owner and origin of the funds.

18. During the User's account registration process an individual User provide the following identification information to the Company:

- User's full name;
- User's date and place of birth and the place of residence or seat;
- Country of residence/location of User;
- Mobile telephone number and e-mail.

19. During the User's account registration process corporate Users provide the following identification information to the Company:

- Full company name;
- Registration number and date;
- Country of registration/incorporation;
- Registered address;
- The names of the director, members of the management board or other body replacing the management board, and their authorization in representing the legal person;
- Mobile telephone number and e-mail.

20. After receiving the identification information, the Company's staff should

verify this information requesting the appropriate documents. Appropriate documents for verifying the identity of User include, but are not limited to, the following:

- For an individual User: a high resolution scanned copy or photo of pages of a passport or any other national ID, indicating family name and name(s), date and place of birth, passport number, issue and expiry dates, country of issue and User's signature.;
- For a corporate User: a high-resolution copy of documents showing the existence of the entity, such as Certificate of Incorporation, and, where applicable, Certificate of Change of Name, Certificate of Good Standing, Articles of incorporation, a government issued business license (if applicable), etc.

21. To verify proof of address of the User the Company requires one of the following to be provided, in the same correct name of the customer: a high-resolution copy of a utility bill (fixed-line phone, water, electricity) issued within the last 3 months; A copy of a tax or rates bill from a local authority; A copy of a bank statement (for a current account, deposit account or credit card account); A copy of a bank reference letter.

22. The User is obliged to collaborate with regard to the AML/ KYC check and to provide any information and document deemed necessary by the Company.

23. The Company may reject any User in its sole discretion after the without being obliged to disclose any reason for the rejection.

24. In case the automatic procedures fail, the Company shall contact the User by email or other means to obtain the information and documents needed. In case the User does not provide the documents in the requested form and any other information requested to satisfy the AML/KYC check within 10 (ten) days which are not public holidays in Estonia of the Company's request, Allbetbet may reject the User and the costs for the AML/KYC check will be at the cost of the User. Additionally, the Company is entitled to partially or fully withhold the received amounts for any costs or damages incurred by the Company. All kind of remittance fees either for fiat currency or for cryptocurrencies shall be borne by the User.