

ANTI MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM

POLICY STATEMENT

Money Laundering and Terrorist Financing have long been identified as a threat to the proper operations of the gaming sector, not just the financial services community with which we work closely. As a result, we must all remain alert to threats of involvement in any money laundering or terrorist financing schemes or activity, to which we might be exposed via our relationships with players, suppliers, partners or indeed behaviour of Group Personnel. We have established a risk based Anti-Money Laundering and Countering the Financing of Terrorism programme reflective of the highest standards of those laws, regulations and regulatory guidance across the wide range of jurisdictions in which we operate. The objective of the programme is to ensure risks associated with money laundering and terrorist financing are identified and appropriately mitigated. The Programme is applied to our worldwide activities.

It is our Policy that;

- Statutory and regulatory obligations as well as Ministerial Directives to prevent money laundering and terrorist financing are to be met in full and are to be applied as a minimum standard
- Dedicated AML/CFT personnel oversee the Group's adherence to statutory and regulatory obligations
- Proactive management and business development engagement with those charged with AML/CFT controls and the Group Money Laundering Reporting Officer (GMLRO) will be conducted, in order to minimise the risk of our products or services being abused for the purpose of laundering of funds associated with criminal activity, or being used as a vehicle for terrorist financing as defined by legislation
- Policies, procedures and processes are risk based; whilst also robust, updated and communicated to all staff as appropriate
- Ongoing testing, monitoring and compliance will take place to provide assurance to the Compliance Committee, the Board and to external regulators that we continue to meet our obligations under anti money laundering and countering terrorist financing legislation
- On a risk basis, the Group may terminate relationships with customers, suppliers or third parties whose conduct gives rise to suspicion of involvement with illegal activities, or where their conduct gives us reasonable cause to know or suspect the use, creation or laundering of criminal proceeds
- In accordance with our obligations we will identify, prevent, investigate and document Money Laundering & Terrorist financing and will report suspicious activity and possession of terrorist property on a timely basis; providing also timely response to requests for assistance from law enforcement, tax authorities or other relevant third parties.