

## AML Policy of Orisun N.V

*Last updated: 15.01.2024*

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## AML (Anti-Money-Laundering) Policy of Orisun

Orisun ("Website") is operated by Orisun N.V., with its office located at Zuikertuintjeweg Z/N (Zuikertuin Tower), Curaçao. Company registration number: 163631 ("Company").

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### Objective of the AML Policy:

We aim to offer the highest level of security to all our users and customers on our Website. To combat fraud and money laundering, we require a three-step account verification to ensure the accuracy of personal details and that the deposit methods used are legitimate. Depending on residence, origin, payment type, or withdrawal method, different safety measures may be implemented. The Website takes reasonable measures to control and limit money laundering risks, dedicating appropriate resources to this end. We are committed to high standards of anti-money laundering (AML) in line with EU guidelines and regulations and require management and employees to enforce these standards to prevent the misuse of our services for money laundering purposes.

The AML program of the Website is designed to comply with:

- **EU:** Directive 2015/849 of the European Parliament and of The Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering
  - **EU:** Regulation 2015/847 on information accompanying transfers of funds
  - **EU:** Various regulations imposing sanctions or restrictive measures against persons and embargoes on certain goods and technology, including all dual-use goods.
  - **BE:** Law of 18 September 2017 on the prevention of money laundering and the limitation of the use of cash.
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### Definition of Money Laundering

Money Laundering is understood as:

- The conversion or transfer of property, especially money, knowing it is derived from criminal activity, for the purpose of concealing or disguising the illegal origin of the property or helping any person involved in such activity to evade legal consequences.

- The concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of property, knowing it is derived from criminal activity or participation in such activity.
- The acquisition, possession, or use of property, knowing that it was derived from criminal activity or from assisting in such activity.
- Participation in, association to commit, attempts to commit, and aiding, abetting, facilitating, and counseling the commission of any of the above actions.

Money laundering shall be regarded as such even when the activities generating the property were carried out in another Member State or a third country.

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## Organization of the AML for the Website

In accordance with AML legislation, the Website has appointed the highest level for the prevention of money laundering: The full management of the Company is in charge. Additionally, an AMLCO (Anti Money Laundering Compliance Officer) oversees the enforcement of the AML policy and procedures within the System. The AMLCO reports directly to the General Management.

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## AML Policy Changes and Implementation Requirements

Each major change to the Website's AML policy is subject to approval by the General Management of the Company and the Anti-Money Laundering Compliance Officer.

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## Three-Step Verification

**Step One:** Step one verification must be completed by every user and customer to withdraw. Regardless of the payment method, withdrawal amount, or nationality, this step must be done first. The verification form, filled out by the user/customer, must include: first name, last name, date of birth, country of residence, gender, and full address.

**Step Two:** Step two verification is required for users making a deposit over 2000 EUR or withdrawing any amount. Until this verification is complete, the withdrawal, tip, or deposit will be on hold. Users will be directed to a subpage where they must submit their ID, accompanied by a paperclip with a six-digit randomly generated number. Only official IDs are acceptable, and the variety of accepted IDs may differ by country. An electronic check will validate the information from step one. If the electronic check fails, the user must provide confirmation of their current residence, such as a government-issued certificate of registration.

**Step Three:** Step three verification is required for users depositing over 5000 EUR, withdrawing over 5000 EUR, or sending another user over 3000 EUR. Until this verification

is complete, the withdrawal, tip, or deposit will be on hold. This step involves providing proof of the source of wealth.

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## **Customer Identification and Verification (KYC)**

Formal identification of customers at the outset of commercial relations is vital for both AML regulations and the KYC policy. Identification relies on:

- A copy of a passport, ID card, or driving license, shown with a handwritten note including six randomly generated numbers. Additionally, a second picture showing the user's face is required. The user may blur personal information for privacy, except for date of birth, nationality, gender, first name, last name, and the picture.
  - All four corners of the ID must be visible and the details clearly readable. Additional information may be requested if necessary.
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## **Proof of Address**

Proof of address will be verified through two different electronic checks using separate databases. If these checks fail, manual proof of residence is required, such as a recent utility bill (issued within the last 3 months) or an official government document proving residence. The document should be clear, with all four corners visible and text readable. Additional verification may be necessary.

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## **Source of Funds**

For deposits over 5000 EUR, a source of wealth (SOW) verification process is required. Examples of SOW include:

- Business ownership
- Employment
- Inheritance
- Investments
- Family

The origin and legitimacy of wealth must be clear. If a user deposits the specified amount (5000 EUR) at once or through multiple transactions, their account will be temporarily frozen. An email will be sent requesting SOW verification, and the Website will also notify users. Bank wire/credit card information and additional financial details may be required.

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## **Verification Form for Step One**

The verification form is accessible via the settings page on the Website. Users must fill out:

- First name
- Last name
- Country of Residence
- Gender
- Date of Birth

The document will be saved and processed by AI. Compliance officers may conduct additional checks if necessary.

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## Risk Management

The Website categorizes nations into three risk regions:

- **Region One (Low Risk):** Standard three-step verification as described.
- **Region Two (Medium Risk):** Verification thresholds are lower: step two after 1000 EUR deposits/withdrawals/tips, and step three after 2500 EUR deposits/withdrawals/tips. Users exchanging cryptocurrency to other currencies are treated as medium risk.
- **Region Three (High Risk):** Players from high-risk regions are banned. This list is updated regularly.

**Additional Measures:** AI monitors for unusual activity and reports to a compliance officer. Data scientists use electronic systems to detect irregular behavior. Users must use the same method for withdrawal as for deposit to prevent money laundering.

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## Enterprise-Wide Risk Assessment

The Website conducts an AML "Enterprise-wide risk assessment" (EWRA) to identify risks specific to its business. This assessment includes service offerings, user transactions, delivery channels, geographic operations, and emerging risks. The EWRA is reassessed annually.

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## Ongoing Transaction Monitoring

AML compliance includes two levels of transaction monitoring:

1. **First Line of Control:** The Website works with trusted Payment Service Providers with effective AML policies.
2. **Second Line of Control:** Awareness and due diligence on transactions by customer support and compliance managers.

A third line of control involves manual checks on suspicious and high-risk users. If fraud or money laundering is detected, authorities will be informed.

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## **Reporting of Suspicious Transactions**

Reports of atypical transactions are analyzed by the AML team. Based on the findings, the AML team will:

- Decide whether to report to the Financial Intelligence Unit (FIU) as required by law.
  - Decide whether to terminate business relations with the customer.
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## **Procedures**

AML rules and minimum KYC standards are outlined in operational guidance available on the Website.

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## **Record Keeping**

Records of identification data must be kept for at least ten years after the business relationship ends. Transaction data must be kept for at least ten years following transactions or the end of the business relationship. Data will be stored securely, both online and offline.

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## **Auditing**

Internal audits regularly review AML activities and report findings.

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## **Data Security**

All user/customer data is stored securely and will not be sold or shared with third parties, except as required by law or to prevent money laundering. The Website complies with the data protection directive (Directive 95/46/EC).

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## **Contact Us**

For questions or complaints regarding our AML and KYC Policy, or for inquiries about procedures related to your account and data, please contact us:

- **By email:** [global@orisun.group](mailto:global@orisun.group)