

## INTERNAL CONTROLS AND ANTI-MONEY LAUNDERING

### INTERNAL CONTROLS

Our Group has established and adopted internal control policies and procedures for the management of its gaming operations, which are designed by referencing to the internal control requirements set forth in the Czech Gambling Act, the Czech AML Act and any other applicable laws and regulations in the Czech Republic. During the Track Record Period and up to the Latest Practicable Date, we confirm that our Group was, and currently is, in compliance with relevant internal control regulations applicable to our Group and has not received any notification from the relevant Czech authorities for any material non-compliance with such regulations.

Our internal control measures on the gaming operations include but are not limited to the following:

- slot operations management, including slot drops and counts procedure, jackpot payout procedure and statistic monitoring;
- table game operations management, including table opening and closing procedures, table fills and credits procedures, chip and cash exchange procedures, winning payout procedures, and table drop and count procedures;
- cage and count management, including cage opening and closing procedures, chip and cash exchange and other exchange procedures, and main safe management;
- daily closing and accounting include regular balance checks and reporting management to monitor and record the daily operation of our casinos;
- intelligent system access controls to monitor the operation of our intelligent systems and control the access rights to the CMS;
- security and surveillance system management, including to control accesses to sensitive areas and monitor such areas with CCTV cameras, control the access to surveillance room, protect physical transfer of excessive cash and monitor and report of suspicious activities;
- gaming equipment and tools management, including slot machines management and gaming chips management;
- loyalty program management to record and manage the loyalty points granted and redeemed, and detect any abnormal loyalty point allocation;
- staff roster and shift change procedures to maintain adequate staffing levels throughout different shifts smoothly and efficiently and to prevent potential internal fraud in our casinos; and

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- anti-money laundering procedures, including procedures on detecting and reporting on large sum transactions, criminal activities and other suspicious transactions, customer due diligence measures and staff AML training. Please refer to the paragraph headed "Anti-Money Laundering" of this section.

### Slot Operations Management

Customers are required to insert their PACs into the slot machines to play slot games. Customers can play slot games by using cash notes inserted directly into the slot machines, gaming credits loaded onto their PACs or loyalty points accumulated in their PACs. Each slot machine has the built-in software that automatically calculates and records all betting transactions. The software of the slot machine tracks and updates the customer's player account in the CMS.

Our Group has established and adopted the internal control policies and procedures to govern slot machines operations, including, among other things, slot drop and count procedures, jackpot payout procedures and statistic monitoring.

#### *Slot Drop and Count Procedures*

The collection and counting of slot machine funds (the "slot drop") are performed around 25 times every month. The process involves several steps to ensure accurate counting and verification of cash collected from slot machines, which are monitored by surveillance team. The count is performed in a count room with restricted access. A counting dealer empties the cash onto a count table, counts the drop amounts for each slot machine under the observation of the count manager. A cash-on-floor report is generated as per the records of the CMS. The slot count team signs off on the machine count report, which is also reviewed and signed by the count manager. The cashier then collects the drop amounts, together with the machine count report, and performs another independent count against the report. In addition, a full count of slot machines is performed on a monthly basis, with the same count procedures.

#### *Jackpot Payout Procedures*

Jackpot pool and winning is automatically run by slot machines according to machine setting by the suppliers of machines. Manual interference is not allowed. When a customer wins a jackpot at a slot machine, the slot machine will be frozen. The cashier team checks against the record in the CMS to verify the jackpot payout amount. The jackpot is only credited to the customer's PAC after both approvals from pit boss and cashier are obtained in the CMS.

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### *Statistic Monitoring*

Slot machine manager is responsible for slot statistics monitoring and has read-only access to slot machine data in the CMS. On a monthly basis, the slot machine manager prepares monthly slot statistics report and has monthly meetings with casino management to review the monthly report on the slot machines operations. The audit team also performs comparison among mechanic metering record, electronic metering record and the CMS record on a monthly basis to ensure slot machine metering is accurate.

### **Table Game Operations Management**

Our Group has established and adopted the internal control policies and procedures to govern table game operations, including, among other things, table opening and closing procedure, table fills and credits procedures, chip and cash exchange procedures, winning payout procedures, and table drop and count procedures.

#### *Table Opening and Closing Procedures*

For the procedure of opening of a gaming table, the opening manager, who is a pit boss or a management with higher level, checks the chip amounts at the table comparing to the table opener slip, which is printed out from the CMS containing information such as transaction number, quantity and total value by chip denomination of that table, signs off and drops the table opener slip into the table drop box. For the procedure of closing of a gaming table, the chip amounts at the table are counted by the dealer under the observation by the closing manager, who is a pit boss or a management with higher level. A table closer slip, which is printed out from the CMS containing the same information as that in a table opener slip, is dually signed off by the dealer and the closing manager and dropped into the table drop box.

#### *Table Fills and Credits Procedures*

When additional gaming chips are required from the cage at a table, a table fill procedure is followed. The duty manager submits a fill request in the CMS, upon which the cash desk prepares the requested chips. The duty manager verifies the chip amounts and transfers the chips in a transparent box called a birdcage to the gaming table, where the dealer checks the chip amounts. On the contrary, when there are excessive gaming chips at table, a table credit procedure is performed. The duty manager submits a table credit request in the CMS, upon which the cash desk prepares a birdcage. The duty manager collects the birdcage from the cage to the gaming table. The dealer prepares the credit chips and counts the chip amounts under the observation by the duty manager. The duty manager then puts the credit chips into the birdcage and transfers to cash desk. Both the table fill and table credit procedures are recorded by the relevant slips with details such as date, time, quantity and total value.

The whole process of all table fills and credits procedures are monitored by the surveillance team.

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### *Chip and Cash Exchange Procedures*

Customers can change cash for gaming chips at the gaming tables. The dealer verifies the authenticity of cash notes with money detector machine and cash notes are then dropped into the table drop box. Authenticity of gaming chips used by customers at table games are also verified by dealers based on their experience. All chip and cash exchange transactions are recorded in the CMS under customers' player accounts.

### *Winning Payout Procedures*

Winning payout is done by the dealer. If a customer wins, gaming chips are distributed to customer by the dealer according to table gaming rules. On the contrary, gaming chips from customer are collected by the dealer if the customer loses. A pit supervisor is also assigned to monitor the winning payout procedures. CCTV cameras are installed to monitor each gaming table and the winning payout procedures are also monitored by the surveillance team.

### *Table Drop and Count Procedures*

Table tip and drop collection and count procedures are performed on a daily basis. The process involves several steps to ensure accurate counting and verification of cash collected from table games, which are monitored by surveillance team. The counts are performed in a count room with restricted access.

Table tip counts are performed first, followed by table drop counts. To conduct table tip counts, a counting dealer empties the gaming chips from the tip box onto a count table, counts the tip amounts for each table under the observation of the count manager. Similarly, to conduct table drop counts, a counting dealer empties the cash and slips from the drop box onto a count table, counts the drop amounts for each table under the observation of the count manager. The count manager checks the counted amounts and the slips for completeness. Both the counted tip amount and drop amount are updated into the CMS by the count manager. After these procedures, the table count team signs off the table count and table daily results report printed out from the CMS, upon which, cashier collects the tip and drop amounts, together with the report and relevant table slips, to perform another independent count against the report.

Drop boxes along with tip boxes are locked. The drop boxes are placed into the locked outer boxes at the gaming table. There are three types of keys, including tip box key, drop box key and outer box key. All keys to the outer boxes, tip and drop boxes are sealed in key pouches. Tip box and drop box keys are only used for tip and drop counts inside the count room. Outer box key is only used when removing and replacing drop boxes. Only pit boss or those management with higher level are authorised to obtain these key pouches for tip and drop counts procedures.

### **Cage and Count Management**

Our Group has established and adopted the internal controls over the cage and count operations, including, among other things, cage opening and closing, chip and cash exchange and other exchange, main safe management.

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### *Cage Opening and Closing Procedures*

Cage is closed on a daily basis at around 8:00 a.m., where a daily cash count is performed as part of the cage balance process. The cash count of both cash and chips at cage is performed by cashier under the observation by a pit boss. Counted cash and chips amounts are updated in the CMS to balance the transactions during the gaming day. Regular cage balance controls are also carried out during the gaming day. The cage is opened for a new gaming day upon the cash count and when the cage balance process is completed.

### *Chip and Cash Exchange and Other Exchange Procedures*

Customers can exchange chips and cash at cash desk of the cage. The cashier is required to sign in the customer into the CMS with his/her PAC before any chip and cash exchange transaction can be conducted. The cashier verifies the authenticity of gaming chips by experience and cash notes by money detector machines. Customers are able to cash out from their player accounts at cash desk, limited to Euro 10,000 every day under the Czech laws. Alternatively, customers can redeem their credits by asking the casino to transfer to their bank accounts. Besides cash, gaming chips can be purchased with debit or credit cards. Customers are also able to exchange foreign currencies at cash desk. Cheques cashing or wire transfers are not available at cash desk.

Except for foreign exchanges transactions, the above transactions are recorded in the CMS under customers' player accounts. Foreign exchanges transactions are recorded in the exchange application, which is approved by the Czech National Bank and can only be used for this purpose.

### *Main Safe Management*

Main safe is located at the back of the cage. Passcode is required to unlock the main safe door where a portion of the passcode is kept by casino management and another portion of the passcode is kept by cashier team. Only cashier team is able to access to the cage with their staff cards, which is managed within the door access control program for casinos. Also, only cashier team is granted the system user access right to the cash desk management module in the CMS. CCTV cameras are installed both at the cage and inside the main safe for monitoring.

### **Daily Revenue Recording and Reporting Management**

To monitor and record the daily operation of our casinos, a daily summary report is printed out by the cashier team from the CMS on a daily basis, which includes information such as opening and closing cash and chips balances, cash and chips transactions, and slot count amount for the gaming day. The daily summary report is also reviewed by pit boss. Reviewed daily summary report, together with relevant supporting reports and documents, are sent to the accounting team for revenue booking. In addition, consolidated daily revenue report is prepared by the audit manager, which included daily revenue for all casinos, and shared with the casino assistant manager or the management with higher level for review.

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### **Intelligent System Access Controls**

Our Group employs policies and procedures to monitor the operation of the intelligent system and control the access rights to the CMS. All slot machine transaction data is automatically recorded in the CMS and not editable. Only slot machine manager and pit boss or those management with higher level have the read-only access to slot machine data in the CMS. A table tablet is located at each gaming table. The table tablet is linked to the CMS system and used for daily gaming table operations and recording. Only pit boss is entitled to log in to access to CMS with the table tablet. After logging in by the pit boss, dealers use the tablet to enter cash and gaming chips exchange transactions for record.

A computer is located at the pit boss desk, which is linked to the CMS system and used for monitoring of slot machines and table gaming activities on a real-time basis. Only pit boss or those management with higher level have the user accounts to log into the CMS with the computer, where user access rights are granted based on corresponding roles and responsibilities.

### **Security and Surveillance System Management**

Our Group has established and adopted the internal control policies and procedures to govern the security and surveillance system.

Accesses to sensitive areas, such as cage, main safe, count room and surveillance room, are restricted to respective teams. All gaming areas are installed with CCTV cameras and under 24-hour surveillance to ensure 100% coverage of gaming areas, the recordings of which are kept in two tape copies for two years, which are requirements under the Czech Gambling Act. Only surveillance team has the access right to the surveillance room with their staff cards. The surveillance room is with surveillance staff on duty all day. Security officer is on duty at the reception of each casino.

Cash level is kept at different maximum amounts at each casino that are approved by senior management at cage, which is the amount covered by insurance. Any excessive cash is transferred to bank on a weekly basis, which is sealed with an untransparent bag and passed to external security company for transfer. Surveillance team is informed of the weekly cash transfer to bank and monitors the whole process.

Surveillance team is also responsible for monitoring and reporting of suspicious activities. Surveillance daily report is prepared on a daily basis and reviewed by the surveillance operations manager, director of audit and compliance and the casino management, who will handle any identified suspicious activities. Any potential AML risk identified is also reported to AML contact person namely, Mr. Tomáš KMENT for handling. Please refer to the paragraph headed "Anti-Money Laundering" of this section.

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### **Gaming Equipment and Tools Management**

Our Group has employed internal control measures on the management of the gaming equipment and tools. Slot machines are located on the gaming floor, which is under 24-hour surveillance covering all slot machines. Gaming chips are certified by the Ministry of Finance in the Czech Republic, and are kept at gaming tables, cash desk and main safe. Playing cards are securely stored at each gaming table. The gaming tables, cage and main safe are under 24-hour surveillance.

### **Loyalty Program Management**

There are internal policies and procedures that apply to our loyalty program. Under our loyalty program, 100 loyalty points equalled to Euro 1, which can be consumed on the slot machines and/or gaming tables or can be used to exchange for non-gaming products such as key chains and T-shirts. For slot machines and table games, loyalty points are automatically credited to the players' user accounts based on the system pre-set calculation. Loyalty points are also granted to the players by the casino management based on their gaming activities, according to established rules for our loyalty programs.

A loyal points summary report, which included all automatically and manually granted loyalty points, is prepared by the audit manager on a monthly basis and shared with the casino assistant manager or above for review. A monthly assessment of manual loyalty allocation is performed by the audit manager. Any abnormal loyalty point allocation is followed up by the casino management.

### **Staff Roster and Shift Change Procedures**

To maintain adequate staffing levels throughout different shifts smoothly and efficiently and to prevent potential internal fraud in our casinos, we implement plans of roster and shift change for our casino employees. Roster plan for gaming table team is planned on a monthly basis, with each shift ranging from eight to ten hours, which is approved by the casino management. In addition, dealer at each gaming table is rotated every 20 minutes. Roster plan for cashier team is planned every one to two months, which is approved by the casino management. Upon shift change, cash and chips count is performed by both the incoming and outgoing cashiers. Roster plan for surveillance team is planned on a monthly basis, with each 12-hour shift, which is approved by the surveillance operations manager and the director of audit and compliance. The rotation plans are prepared and updated in the CMS by the pit boss.

Our Group engaged an international advisory firm as its Internal Control Consultant and conducted an internal control review of gaming operations for Palasino Group. Our Company has implemented additional internal control measures over gaming operation process as recommended by the Internal Control Consultant. The Internal Control Consultant conducted a follow up review of those additional internal control measures over gaming operation process, and did not find further deviations to indicate control inadequacies and ineffectiveness.

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### ANTI-MONEY LAUNDERING

#### Regulatory Regime

Our Group has established and adopted the policies and procedures for the AML management, which are approved by Financial Analytical Office ("FAU"). The AML policy and procedures of our Group are designed to meet the internal control requirements set forth in the Czech Gambling Act, the Czech AML Act, and any other applicable laws and regulations in the Czech Republic. For regulatory regime on AML measures that are applicable to our Group, please refer to "Regulatory Overview — Overview of Regulatory Framework of Gaming Operations in the Czech Republic — Anti-money Laundering Regulation in the Czech Republic."

#### Anti-Money Laundering Controls

Our Group has put in place controls designed to detect and prevent money laundering in our casinos and gaming operations. The management of our Group is, and will continue to be, solely responsible for designing, implementing and maintaining appropriate systems, internal controls, processes for AML including, without limitation, systems designed to assure compliance with policies, procedures, and applicable laws and regulations.

Our Group continuously updates its AML policies in order to ensure compliance with any relevant new laws and regulations of the Czech Republic. Various departments and functional teams of our Group, including gaming operations, surveillance, security and internal audit departments, are involved in and contribute to ensuring compliance with AML policies. During the Track Record Period and as at the Latest Practicable Date, we believe that our Group was in compliance with all AML regulations applicable to our Group and has not received any notification from the relevant Czech authorities for any material non-compliance with such regulations.

The AML policies of our Group require:

- compliance with all AML legal and regulatory requirements in the Czech Republic;
- periodic assessment of the risk level and changes in our Group's operations and indicators of suspicious activity;
- a system of procedures and controls designed to detect and report suspicious activities in gaming operations through cage, gaming operations, security and surveillance;
- background due diligence through our screen system, in which, among others, suspicious activities are identified, and further diligence is conducted to identify suspected violators, blacklisted persons, money launderers, terrorists and other sanctioned individuals and organisations; and



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- comprehensive training of all relevant staff prior to the commencement of their work and on annual basis thereafter, concerning our Group's AML mission, policy, procedures and controls and job-specific information to help identify indicators of suspicious activity.

We have implemented the following key measures to help detect and mitigate money laundering risks in our casinos:

- procedures on identification of indicators of money laundering risk and suspicious activity, which mainly include, without limitation:
  - customers are required to provide their source of fund at registration. The Czech customers are required to register once while the overseas customers are required to re-register every 90 days. The customers have the obligation to inform us on any change of source of fund. Customers are automatically classified into four categories. Each customer category has its monthly normal trigger limit, which are also updated in the CMS when the source of fund changed.
  - customers are required to provide their nationality and permanent residence at registration. Customers coming from a country on the list of countries at risk maintained in the CMS are automatically classified as high-risk customers. When such customers enter our casinos, automatic notification emails are sent to the casino management, surveillance team and pit boss for increased monitoring.
- customer due diligence measures including Know Your Customer (KYC) procedures. This process mainly includes, without limitation:
  - new customers are required to register a player account at casino reception before entering casinos, including completion of registration form, scanning of identity documents, recording of customer's information in the CMS, politically exposed person check and international sanction check. A customer's information, including scanned registration form, identity documents and transaction records, is retained in the CMS for ten years since his/her last transaction with our casinos.
  - a list of persons subject to international sanctions is maintained in the CMS. Any persons subject to national or international sanctions are automatically notified in the CMS and not allowed to enter into our casinos. In addition, a list of countries at risk is maintained in the CMS. Customers coming from a country at risk are classified as high-risk customers. When they enter our casinos, automatic notification emails will be sent to the casino management, surveillance team and pit boss for increased monitoring. Both lists are updated upon any change in sanctions list.

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- database of blacklisted individuals is maintained in the intelligence database in the CMS. Any updates of the blacklist database are approved by the regional casino operations manager. Blacklisted individuals are not allowed to enter into our casinos.
- procedures on identifying, recording and reporting large sum transactions, criminal activities and other suspicious transactions. These procedures mainly includes, without limitation:
  - all customers have a monthly normal trigger limit under their player accounts in the CMS. Any transactions exceeding the monthly normal trigger limit are notified in the CMS where the pit boss is required to obtain additional information and assess if there are any suspicious activities. The assessment result and additional information are also recorded in the CMS.
  - any suspicious activities, including potential criminal activities, identified by the CCTV cameras are recorded in surveillance daily report by surveillance team and handled by the surveillance operations manager, director of audit and compliance or the casino management.
  - any other suspicious activities, potential criminal activities and behaviours observed by gaming team are reported to the casino management for handling. Surveillance team is informed of the suspicious activities for monitoring. Additional investigation may be conducted based on the judgement of the casino management or higher management.
  - any potential AML risk identified is reported by the casino management to AML contact person for handling. After collecting relevant information, the reported case is assessed by AML contact person based on features of suspicious transactions stipulated in AML policies, as well as his experience and knowledge. Based on the assessment result, AML contact person may file a notification of suspicious (the "OPO") trade to FAU, if necessary, for its instruction. The OPO includes information such as identification data of the suspicious trade notifier, identification details of the person concerned by the notification, a detailed description of the subject matter and material circumstances of the suspicious transaction, a notice where the notification also relates to property subject to international sanctions, whether and when the trade is carried out or postponed, or the reason why the trade is or is not carried out, and contact information.

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- procedures on monitoring large cash transactions in the exchange counters, which mainly includes, without limitation:
  - any chip and cash exchange transactions exceeding the monthly normal trigger limit are notified in the CMS where the pit boss is required to obtain additional information and assess if there are any suspicious activities.
  - for any foreign exchange transactions over Euro 1,000, the cashier is required to register a customer profile in foreign exchange application for record.
  - customers are only able to cash out from their player accounts and exchange foreign currencies up to Euro 10,000 every day under the Czech laws.

Our Group engaged an international advisory firm as its AML consultant and conducted a limited assurance review over the AML management process for Palasino Group and the report is set out in Appendix V to this document, which, among others, stated “nothing has come to the AML consultant’s attention that causes them to believe that Palasino Group’s AML control procedures do not comply, in all material respects, with the AML statutes and guidelines for the period from July 1, 2022 to June 30, 2023”.

As advised by our Czech Legal Advisers, we complied with the relevant laws and regulations in the Czech Republic with respect to the operations of gambling activities and anti-money laundering in all material aspects during the Track Record Period and up to the Latest Practicable Date. As advised by our Czech Legal Advisers, there had been no regulatory fines and/or penalties imposed on our Group, and our Group is not aware of any investigations against us in relation to AML, during the Track Record Period and up to the Latest Practicable Date.

### **Internal Control and AML measures for Palasino Malta**

The IT systems of Palasino Malta have passed the MGA System Audit undertaken in July 2023 and its internal control policies and procedures were approved by MGA. Our Company has designed internal control and anti-money laundering measures in its standard operating procedures in accordance with the relevant Maltese gaming and anti-money laundering laws and regulations.

The following written policies and procedures were designed for Palasino Malta:

- Anti-money laundering
- Customer registration and verification
- Customer funds on account
- Management of customers at risk (including AML risk and business risk)

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- Responsible gambling and player protection
- Handling of customer complaints
- Reconciliation between the record per online gaming system and the bank record
- Accounting for recording payments and receipts

Our Company will only accept deposits made from accounts held with licenced financial institutions or through licenced payment providers, via bank transfers, credit or debit cards, or licenced payment service providers. Cash deposits will not be accepted. Withdrawals will only be remitted to the same account from which the funds originated, and where this is not possible, verification of ownership of the payment method to be used for withdrawal would be required.

Our Company has designed the Responsible Gambling Procedure according to the Gaming Player Protection Regulations in Malta. Our Company will offer responsible gaming tools, such as deposit limit, wager limit, loss limit, session limit, periodic reality check notifications (summary of wins, losses and money wagered) and self-exclusion, to all customers, which are readily available for the customer to use at any point of the business relationship. Customer behaviours, such as the timing, duration and frequency of gambling and communications with Customer Service, will be monitored by the Company. If any problematic gambling behaviour is identified, our Company will contact the concerned customer and offer or impose the responsible gaming tools and support, or even refuse further service to the concerned customer.

To prevent players from jurisdictions that prohibit gambling from playing, it was stipulated in our Company's policies that:

- (1) the registering player must indicate his/her country of residence from a drop-down menu which only contains jurisdictions that allow gambling and jurisdictions that our Company's online business operates in.
- (2) our Company will continuously monitor the registration data and the operating data to identify any suspicious activities, including monitoring the player's IP address.
- (3) a geo-location lock has also been implemented where the IP used to access the site (prior to registration and/or login) is a non-Maltese IP address, which consequently prevents registration and/or log in.

AML policies and procedures were designed according to the Maltese AML-related laws and regulations. Specifically, the policies and procedures included:

- the appointment of a Money Laundering Reporting Officer;

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- procedures related to the ongoing monitoring of payment and gaming transactions;
- the Customer Acceptance Policy that described the categorisation of risk levels of customers based on their background and behaviours, such as Politically Exposed Persons or income sources;
- the Anti-Money Laundering Procedures that described the registration checks such as email or phone number verification and sanction list checking, on-going assessment of risk levels of customers based on the registration details and customers' behaviours, suspicious transaction reporting and money laundering risk analysis;
- the Player Registration & KYC Procedures that described the triggers and procedures for Customer Due Diligence and Enhanced Due Diligence:
  - Customer Due Diligence would be performed when a player reaches the EUR2,000 threshold in cumulative deposits since the account registration within a rolling period of 180 days, where such player must complete a know-your-client ("KYC") questionnaire, present a valid government-issued identity card or passport and proof of residential address to our Company;
  - Enhanced Due Diligence on players requiring further documents and verification would be performed if suspicious activities, such as the login IP address differing from the indicated country of residence at registration, are identified, or a player has been identified as high-risk according to our Company's relevant gaming and anti-money laundering policies.
- the Employee Due Diligence Procedures that described the different due diligence checks on employees based on their duties and responsibilities in the operations, such as requesting copy of identification documents, reference checking, police conduct certificate and annual involvement and interest declaration for senior management and directors;
- the Employee Awareness Procedures that described the training programs on AML and Responsible Gaming provided to all employees and directors, including the training topics, time and terms; and
- the Suspicious Reporting Procedures that described the procedures of internal Suspicious Transaction Report and external Suspicious Transaction Report to the Financial Intelligence Analysis Unit in Malta.

It is stipulated in our Company's Internal Audit Policy that the Internal Audit Department is responsible for ensuring our Company's full compliance with the applicable laws and regulations and adherence to the internal standard operating procedures through continuous monitoring and evaluation.