ANTI-MONEY LAUNDERING (AML) & COUNTER-TERRORIST FINANCING (CTF) POLICY

WarWin.casino
Operated by WarWin Group International Ltd
Registration Number: 000054736
Registered Address: San Victor Street, Orange Walk Town, Belize
Effective Date: January 2026 License: issued by Anjouan Licensing Services Inc.

1. INTRODUCTION

This Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Policy applies to all gaming, betting, and related services provided by WarWin.casino.

The Company is committed to preventing money laundering, terrorist financing, fraud, and other financial crimes in accordance with international standards, including:

- Financial Action Task Force (FATF) Recommendations
- Applicable international regulatory standards

2. POLICY STATEMENT

WarWin.casino adopts a zero-tolerance approach to money laundering and terrorist financing.

All employees, contractors, agents, and partners are required to comply with this Policy and applicable laws at all times.

Failure to comply may result in disciplinary action, termination, and legal reporting.

3. DEFINITIONS

Money Laundering: The process of concealing the illegal origin of funds.
Terrorist Financing: Providing or collecting funds to support terrorist activities.
Customer: Any individual registered on WarWin.casino.
CDD: Customer Due Diligence.
EDD: Enhanced Due Diligence.
MLRO: Money Laundering Reporting Officer.

4. GOVERNANCE AND RESPONSIBILITY

The Company appoints an MLRO responsible for:

- Implementing AML controls
- Monitoring compliance

- Investigating suspicious activity
- Reporting to authorities

Senior management provides oversight and ensures adequate resources.

5. RISK-BASED APPROACH

WarWin.casino applies a risk-based approach by evaluating:

- Customer profile
- Geographic location
- Transaction patterns
- Payment methods
- Game behavior

Customers are categorized as Low, Medium, or High risk.

High-risk customers are subject to Enhanced Due Diligence.

6. CUSTOMER DUE DILIGENCE (CDD) AND KYC

6.1 Standard Due Diligence

At registration, customers must provide:

- Full legal name
- Date of birth
- Residential address
- Email and phone number
- Government-issued photo ID
- Proof of address (within 3 months)

6.2 Enhanced Due Diligence (EDD)

EDD applies to:

- Politically Exposed Persons (PEPs)
- High-value players
- High-risk jurisdictions
- Unusual transaction behavior

EDD may include:

- Source of funds verification
- Source of wealth verification

- Additional documentation
- Management approval

6.3 Ongoing Due Diligence

Customer activity is monitored continuously.
Information is updated upon material changes.

6.4 Prohibited Accounts

Accounts are prohibited for:

- Persons under 18
- Restricted jurisdictions
- Sanctioned individuals

7. TRANSACTION MONITORING

All deposits, wagers, and withdrawals are monitored through automated and manual systems.

Red flags include:

- Large or frequent transactions
- Rapid deposit-withdrawal cycles
- Structuring activity
- Multiple account usage
- Unusual payment methods

Alerts are reviewed by compliance staff.

8. SUSPICIOUS ACTIVITY REPORTING

All employees must report suspicious activity to the MLRO immediately.

The MLRO investigates and files Suspicious Activity Reports (SARs) with relevant authorities when required.

Internal reporters are protected from retaliation.

9. RECORD KEEPING

Records are maintained securely for a minimum of five (5) years, including:

- KYC documentation
- Transaction history

- Risk assessments
- Monitoring logs
- SAR records

Records are stored in secure digital systems.

10. STAFF TRAINING

All personnel receive mandatory AML training:

- Upon onboarding
- Annually thereafter

Training covers:

- AML risks
- Regulatory obligations
- Red flags
- Reporting procedures

11. PAYMENT METHODS AND CRYPTOCURRENCIES

WarWin.casino supports fiat and cryptocurrency payments.

Controls include:

- Source verification
- Wallet monitoring
- Blockchain analytics
- Transaction screening

Crypto transactions are subject to the same compliance standards as fiat.

12. SANCTIONS AND WATCHLIST SCREENING

Customers are screened against:

- United Nations lists
- European Union lists
- OFAC lists
- Other international databases

Screening is conducted at onboarding and continuously.

13. DATA PROTECTION

Customer data is processed in accordance with applicable data protection laws.

All AML records are kept confidential and securely stored.

14. INTERNAL AUDIT AND COMPLIANCE REVIEW

Internal compliance reviews are conducted periodically.

External audits may be conducted where required.

Deficiencies are remediated promptly.

15. POLICY REVIEW

This Policy is reviewed annually or following regulatory changes.

Updates are approved by senior management.

16. CONTACT

For AML matters, contact:

Compliance Department
Email: compliance@warwin.casino

17. FINAL STATEMENT

WarWin.casino is committed to maintaining the highest standards of integrity, transparency, and regulatory compliance.

This Policy supports all licensing, regulatory, and payment service obligations.