



## Customer Acceptance Policy

September 26th 2024 - Version 1.0

### 1. Eligibility Criteria:

To become a Clubs Casino customer, you must meet the following criteria:

- a. Individual Status: You must be a natural person. Clubs Casino does not accept companies or any other legal entities as customers.
- b. Acceptance of Terms: You must have read and agreed to the most recent applicable Terms of Use, including any relevant Privacy Policy, Sweeps Rules, Responsible Social Gameplay Policy, and this Customer Acceptance Policy.
- c. Adherence to Terms: You are required to follow our Terms of Use at all times.
- d. Personal Registration: You must register with and transact on any Clubs Casino platform on your own behalf.
- e. Ownership of Payment Mediums: You should use payment methods for which you are the legal and beneficial owner.
- f. Age Requirement: You must be 18 years or older
- g. Residence: You should reside in the United States (excluding the States of Idaho, Louisiana, Michigan, Montana, Nevada, and Washington).
- h. Identification and Verification: You must undergo satisfactory identification and verification procedures as part of Clubs Casino's risk and anti-fraud program, as applicable.
- i. Due Diligence Measures: You are required to satisfy Clubs Casino's due diligence measures, including source of wealth and funds checks, as applicable.
- j. Information Submission: Provide requested information and documents to Clubs Casino in accordance with its risk and anti-fraud program.
- k. Exclusion Criteria: You must not fall under the following categories:
  - i. a politically exposed person (past or present) (PEP)
  - ii. a family member or close associate of a PEP
  - iii. named on any sanctions list issued by the United Nations, or the United States
  - iv. directly or indirectly linked to countries or territories subject to comprehensive sanctions
  - v. an individual with a risk profile falling outside of Clubs Casino's risk tolerance as determined in Clubs Casino's sole discretion
- l. If you meet these criteria, Clubs Casino may request additional information if you are classified as high risk or if such information is deemed necessary from time to time.

### 2. High-Risk Classification

- a. Clubs Casino continuously screens customer information, purchases, redemptions, game activity, and behaviors for financial crime risk indicators.

Customers are classified as having various risk levels based on specific facts and context. Clubs Casino classifies a customer as high risk if they pose or are likely to pose money laundering, funding of terrorism, or other financial crime risks that could have financial or reputational consequences for Clubs Casino. While Clubs Casino aims to investigate financial crime risk alerts promptly, compliance with applicable laws may result in delays as additional due diligence is conducted.

### 3. Requested Information for High-Risk Customers

- a. If Clubs Casino classifies you as high risk or determines that extra information is required, you may be asked to provide information on, or evidence of, the following:
  - i. Income-generating activities.
  - ii. Estimated net worth or sources of wealth.
  - iii. Anticipated pattern and level of Gold Coin purchases.
  - iv. Sources of funds used in specific Gold Coin purchase transactions.
  - v. Identity attributes, including name, date of birth, and address.
- b. Failure or refusal to submit the required information within the communicated timeframe may result in Clubs Casino terminating the business relationship and closing your account.

### 4. Compliance with Legal Requirements

- a. Clubs Casino is obligated to maintain a risk and anti-fraud compliance program, as mandated by applicable laws and its third-party service providers.

### 5. Key Aspects of Clubs Casino's Risk and Anti-Fraud Program

- a. The key aspects of Clubs Casino's risk and anti-fraud program include, but are not limited to:
  - i. Appointment of a money laundering reporting officer or equivalent position.
  - ii. Customer due diligence program incorporating customer identification and verification based on information from independent and reliable sources and know your customer principles.
  - iii. Enhanced due diligence on customers assessed as higher risk.
  - iv. Implementation of processes and systems to monitor customer transactions for suspicious activity.
  - v. Investigation and, when appropriate, reporting of suspicious activity to regulatory bodies.
  - vi. Mandatory training of Clubs Casino employees and contractors in financial crime risks.
  - vii. Prohibition of business with customers having an unacceptable level of risk.

- viii. Continuous monitoring of purchase and redemption levels against anticipated account activity, estimated customer net worth, and economic profile data.
  - ix. Investigation of significant deviations in a customer's economic profile and their purchase levels.
  - x. Adherence to additional local requirements applicable to Clubs Casino
- b. Clubs Casino prioritizes maintaining a safe and compliant environment for its customers while adhering to legal obligations and industry best practices.