

ANTI-MONEY LAUNDERING (AML) & KNOW YOUR CUSTOMER (KYC) POLICY

Aintuition Casino (aintuitioncasino.io)

Operated by **AINTUITION LIMITED**

Company No: 1689151-9 (Canada)

Licensed in Anguilla

1. PURPOSE

This Anti-Money Laundering (AML) and Know Your Customer (KYC) Policy establishes the framework by which Aintuition Casino ("the Company", "we", "our") prevents, detects, and reports money laundering, terrorist financing, fraud, and other illicit activities.

This policy is designed to comply with:

- Applicable laws and regulations in **Anguilla**
 - Relevant Canadian AML frameworks
 - International standards including **FATF (Financial Action Task Force)** recommendations
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2. SCOPE

This policy applies to:

- All customers of Aintuition Casino
 - All employees, contractors, and affiliates
 - All transactions conducted through the platform
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3. RISK-BASED APPROACH

The Company adopts a **risk-based approach** to AML/KYC compliance by:

- Identifying customer risk profiles
- Monitoring transaction behavior
- Applying enhanced due diligence (EDD) where necessary

Risk levels include:

- **Low Risk** – standard customers with minimal exposure
 - **Medium Risk** – customers with moderate transaction activity
 - **High Risk** – high-value players, high-risk jurisdictions, or unusual behavior
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4. CUSTOMER IDENTIFICATION (KYC)

4.1 When KYC is Required

KYC verification is required:

- Upon account registration (basic level)
 - Before withdrawals
 - When deposits/withdrawals exceed predefined thresholds
 - When suspicious activity is detected
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4.2 Information Collected

Customers must provide:

- Full legal name
 - Date of birth
 - Residential address
 - Email address and phone number
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4.3 Identity Verification

The Company may require:

- Government-issued ID (passport, driver's license, national ID)
 - Proof of address (utility bill, bank statement, within last 3 months)
 - Selfie or biometric verification
 - Payment method verification
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4.4 Age Verification

All users must be **18 years or older** (or higher depending on jurisdiction).

Accounts failing age verification will be suspended and funds withheld pending investigation.

5. ENHANCED DUE DILIGENCE (EDD)

EDD is applied when:

- Customer is a **Politically Exposed Person (PEP)**
- Customer resides in or transacts from a **high-risk jurisdiction**
- Large or unusual transactions occur
- Suspicious activity is detected

EDD measures may include:

- Source of funds verification
- Source of wealth verification
- Additional identity documentation

- Ongoing transaction scrutiny
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6. ONGOING MONITORING

The Company continuously monitors:

- Transaction patterns
- Betting behavior
- Deposit and withdrawal activity

Red flags include:

- Rapid deposits and withdrawals with minimal gameplay
 - Use of multiple accounts
 - Use of VPNs or location masking
 - Structuring transactions to avoid thresholds
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7. PROHIBITED USERS & JURISDICTIONS

The Company does not accept users:

- From sanctioned or embargoed countries
 - Listed on international sanctions lists (e.g., OFAC, UN)
 - Identified as fraudsters or previously banned users
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8. REPORTING SUSPICIOUS ACTIVITY

If suspicious activity is identified:

- A **Suspicious Activity Report (SAR)** will be generated
- Reports may be submitted to relevant regulatory authorities
- Customer accounts may be frozen during investigation

The Company maintains strict **confidentiality** and prohibits tipping-off.

9. RECORD KEEPING

The Company retains records of:

- Customer identification data
- Transaction history
- AML investigations

Retention period:

- Minimum **5 years** (or as required by law)
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10. DATA PROTECTION

All collected data is handled in accordance with:

- Applicable data protection laws
- Internal security policies

Data is:

- Encrypted and securely stored
 - Access-restricted
 - Used solely for compliance and operational purposes
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11. EMPLOYEE TRAINING

All relevant staff receive AML/KYC training covering:

- Identification of suspicious activity
- Regulatory obligations
- Internal reporting procedures

Training is conducted:

- Upon hiring
 - On an ongoing basis
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12. INTERNAL CONTROLS

The Company implements:

- Automated monitoring systems
- Risk scoring mechanisms
- Compliance oversight

A designated **AML Compliance Officer** is responsible for:

- Policy enforcement
 - Reporting obligations
 - Regulatory communication
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13. SANCTIONS SCREENING

Customers are screened against:

- International sanctions lists
 - Politically Exposed Persons (PEP) databases
 - Watchlists and adverse media
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14. NON-COMPLIANCE & ACCOUNT ACTIONS

Failure to complete KYC or comply with AML requirements may result in:

- Account suspension
 - Withdrawal restrictions
 - Account termination
 - Reporting to authorities
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15. POLICY REVIEW

This policy is reviewed:

- Annually
 - Upon regulatory changes
 - When operational risks evolve
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16. CONTACT

For AML/KYC-related inquiries:

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