INTRODUCTION

Money laundering and terrorist financing (ML/TF) pose a significant threat to economic, social, and political stability both nationally and globally. As a provider of online gaming services, Nairamax Lotto recognizes the importance of preventing and detecting money laundering and terrorist financing. This policy establishes the necessary procedures and controls to comply with applicable Nigerian legislation. Through this Manual, Nairamax Lotto aims to implement methodologies and procedures to design and implement a system for the prevention and control of money laundering and terrorist financing. This approach aligns with best practices, fostering an organisational culture focused on compliance with established regulations in this area.

OBJECTIVES

The main objective of this manual is to:

Establish a comprehensive framework for the prevention and control of money laundering and terrorist financing for Nairamax Lotto, ensuring compliance with Nigerian legislation and promoting an organisational culture oriented towards regulatory compliance and business ethics.

Define the roles and responsibilities of company personnel regarding the prevention and detection of activities related to money laundering and terrorist financing.

Establish clear and effective procedures for identifying, assessing, and managing risks associated with money laundering and terrorist financing in all company activities and operations.

Provide guidance and adequate training to Nairamax Lotto's personnel to enhance their understanding of the risks associated with money laundering and terrorist financing, as well as to familiarise them with internal procedures and tools available to prevent and detect such illicit activities.

Establish effective monitoring and control mechanisms to identify and manage suspicious money laundering and terrorist financing operations, as well as to ensure the periodic review and updating of prevention policies in line with legislative changes and emerging risks.

IMPLEMENTATION OF THE MANUAL

Without prejudice to a more extensive development of the measures implemented by Nairamax Lotto, the principles guiding it for the implementation of these measures are:

a) Detection and prevention of illegal or unlawful activities.

b) Creation of a compliance culture and dissemination of the manual's content.

PREVENTION MECHANISMS

Clients

In accordance with the website's terms and conditions and with respect to applicable legislation, Nairamax Lotto will undertake the following measures regarding users:

a) Due diligence in customer identification: Nairamax Lotto will conduct a thorough verification of customers' identities at the time of registration, including verification of valid identification documents and verification of the information provided.

b) Monitoring of suspicious activities: Nairamax Lotto will implement continuous monitoring systems of customers' transactions and activities to detect unusual or suspicious patterns that may indicate attempts at money laundering.

c) Transaction limits: Nairamax Lotto will establish limits on customers' financial transactions, both in deposits and withdrawals, and closely monitor any transaction exceeding these limits.

d) Reporting of suspicious transactions: Establish clear procedures for reporting suspicious transactions to competent authorities, in accordance with Nigerian legislation and suspicious transaction reporting (STR) requirements.

SUPPLIERS

In accordance with Nairamax Lotto's internal procedures, the following supplier control measures will be implemented:

a) Due diligence in supplier selection: Nairamax Lotto will conduct thorough due diligence when selecting new suppliers, including verification of their legal identity, business background, and reputation.

b) Risk assessment: Nairamax Lotto will assess the money laundering risk associated with each supplier and their business activities, considering factors such as country of origin, type of products or services provided, and supplier's compliance history.

c) Clear contracts and agreements: Nairamax Lotto will establish clear contracts and agreements with suppliers that include provisions related to compliance with anti-money laundering laws and regulations, as well as termination clauses in case of non-compliance.

d) Monitoring of financial transactions: Nairamax Lotto will implement financial transaction monitoring systems to detect unusual or suspicious patterns in payments made to suppliers, which could indicate money laundering activities.

e) Verification of business activities: Nairamax Lotto will verify the legitimacy of business activities declared by suppliers, including reviewing invoices, contracts, and other supporting documents.

f) Reporting of suspicious activities: Nairamax Lotto will establish procedures to report any suspicious activity related to a supplier to competent authorities, in accordance with applicable legal and regulatory requirements.

CONSIDERATIONS

Nairamax Lotto will implement an alert system based on the results of the measures described above. Alert signals represent a crucial tool for Nairamax Lotto in the detection and prevention of suspicious activities related to money laundering and terrorist financing. In case any of the operations or situations described here are identified, it will be the responsibility of Nairamax Lotto to carry out their analysis and evaluation to determine if they constitute suspicious activities.

By way of example, a series of assumptions that could be considered indicative of money laundering are listed here:

a) The client or supplier refuses to provide the information required for internal registration or presents inconsistent, unusual, or suspicious identifications.

b) There is public knowledge, through media outlets or other means, that a client or supplier is being investigated or prosecuted for money laundering offenses, predicate offenses, terrorist financing, or related crimes.

c) The client or supplier shows an unusual lack of concern regarding the risks or costs associated with the business or transaction they are conducting.

d) The client or supplier repeatedly carries out fractional transactions.

e) The client or supplier carries out complex operations without an apparent purpose.

f) The client or supplier consistently performs operations and shows an unusual preference for using cash as the only means of payment.

g) The client or supplier insists on meeting with Nairamax Lotto's staff in a location other than the office, agency, or designated premises for conducting business or financial activities.

Cooperation with Authorities

Nairamax Lotto will fully cooperate with competent authorities in investigating any suspicious activity related to money laundering or terrorist financing. Information exchange will be facilitated, and assistance will be provided as necessary.

Review and Update

This policy will be periodically reviewed to ensure its adequacy to changes in legislation and emerging risks. A culture of continuous improvement in the prevention of money laundering and terrorist financing will be encouraged.

Compliance

Failure to comply with this policy by any employee of the company may result in disciplinary measures, including termination of employment, depending on the severity of the breach. Non-compliance by customers or suppliers may result in termination of the relationship and account blocking in accordance with gaming legislation.

Disclosure of Policy

This policy will be communicated to all company personnel and will be available for consultation at all times. Employees are encouraged to familiarise themselves with its content and to comply with its provisions.