

Know Your Business (KYB) Policy

Bridgepoint Solutions Ltd

Effective date: 26.09.2025

1. Introduction

1.1 Background:

Bridgepoint Solutions Ltd is dedicated to maintaining the highest standards of integrity and security within the gaming ecosystem. This KYB Policy outlines the stringent procedures and comprehensive practices employed to verify and validate the identities of potential game providers and partners.

1.2 Objectives:

The primary objectives of this policy are to mitigate the risk of fraud, ensure compliance with regulatory standards, and foster a secure gaming environment for all stakeholders involved.

2. Verification Process

2.1 Documentation Submission:

2.1.1. Game providers must submit a comprehensive set of legal documents, including but not limited to:

- Business registration certificates.
- Licenses obtained from relevant regulatory bodies.
- Proof of domain ownership
- Review of AML and business policies.
- Any other documentation deemed necessary by Bridgepoint Solutions Ltd.

2.1.2. The submission process includes a secure online portal and encrypted document transfer mechanisms to ensure the confidentiality and integrity of the documents.

2.2 Ownership Verification:

2.2.1. Bridgepoint Solutions Ltd conducts thorough checks to verify the ownership structure of the game provider. This involves:

- Review of Identification proof of shareholders and Directors (2 forms of ID and proof of address, not older than 90 days).
- Scrutiny of shareholder agreements and corporate governance documents.
- Utilization of blockchain or similar technologies for transparent ownership confirmation.

2.2.2. Independent third-party verification services may be employed for an additional layer of assurance.

2.3 Financial Checks:

2.3.1. Comprehensive financial checks include:

- Analysis of audited financial statements for the past three fiscal years.
- Verification of solvency ratios and liquidity positions.
- Review of Business plan.

2.3.2. Periodic financial reviews may be conducted to identify any sudden changes in financial stability.

2.4 Operational Assessment:

2.4.1. Operational assessments encompass a holistic evaluation of the game provider's operations, including:

- Examination of internal controls and risk management practices.
- Review of incident response and business continuity plans.
- In-depth analysis of the provider's technological infrastructure.

2.4.2. Bridgepoint Solutions Ltd may collaborate with cybersecurity experts to assess the resilience of the provider's systems against potential threats.

2.5 Technology and Innovation:

2.5.1. Bridgepoint Solutions Ltd leverages advanced technologies such as:

- Artificial intelligence (AI) for anomaly detection.
- Machine learning algorithms for pattern recognition.
- Biometric verification for enhanced security.

2.5.2. Continuous investment in research and development ensures the integration of the latest technological advancements into the KYB process.

2.6 Global Reach and Local Compliance:

2.6.1. The KYB process is designed to accommodate the diverse regulatory landscapes in different jurisdictions while maintaining a consistent commitment to the highest standards of compliance.

2.6.2. Regulatory experts in each jurisdiction of operation ensure that the KYB procedures align with local requirements without compromising the overall integrity of the process.

2.7 Collaboration with Third-Party Auditors:

2.7.1. Bridgepoint Solutions Ltd may engage reputable third-party auditors or compliance specialists to conduct independent assessments of KYB procedures.

2.7.2. Collaborative efforts with external auditors enhance transparency and provide an unbiased evaluation of the effectiveness of the KYB process.

3. Compliance with Regulatory Standards

3.1 Legal Framework:

3.1.1. Bridgepoint Solutions Ltd is committed to adhering to all applicable laws and regulations governing the gaming industry.

3.1.2. A legal team monitors changes in regulatory frameworks and ensures that the KYB process remains in strict accordance with the legal requirements of the jurisdictions in which Bridgepoint Solutions Ltd operates.

3.1.3 Primary legislation

3.2 Regulatory Reporting:

3.2.1. Compliance officers are responsible for preparing and submitting regular reports to relevant regulatory bodies.

3.2.2. Reports include details on KYB procedures, findings, and actions taken to address any non-compliance issues.

4. Confidentiality

4.1 Data Security Measures:

4.1.1. All information provided by game providers during the KYB process is subject to robust data security measures.

4.1.2. Encryption protocols, access controls, and secure storage mechanisms are employed to protect the privacy and integrity of all collected data.

4.2 Data Retention Policy:

4.2.1. Bridgepoint Solutions Ltd maintains a data retention policy that outlines the duration for which KYB data is stored.

4.2.2. Regular reviews are conducted to identify and securely dispose of any unnecessary or outdated information.

5. Ongoing Monitoring

5.1 Continuous Surveillance:

5.1.1. The KYB process is a continuous and dynamic surveillance system.

5.1.2. Automated monitoring tools are employed to track changes in the financial, operational, and legal status of game providers.

5.2 Periodic Reviews:

5.2.1. Periodic reviews of the provider's status are conducted on a scheduled basis.

5.2.2. In-depth assessments are triggered by significant events such as changes in ownership, legal disputes, or adverse regulatory findings.

6. Right to Deny or Terminate Partnership

6.1 Adverse Findings:

6.1.1. Bridgepoint Solutions Ltd reserves the unequivocal right to deny collaboration or terminate an existing partnership if adverse findings emerge during the KYB process.

6.1.2. Adverse findings include but are not limited to non-compliance with regulatory standards, questionable financial stability, or evidence of fraudulent activities.

6.2 Appeal Mechanism:

6.2.1. Game providers have the right to appeal decisions leading to the denial or termination of partnership.

6.2.2. A dedicated appeals process is established, ensuring fairness and providing an opportunity for game providers to present additional information or rectify identified issues.

7. Updates to the KYB Policy

7.1 Regular Reviews:

7.1.1. Bridgepoint Solutions Ltd conducts regular reviews of the KYB policy to ensure its alignment with evolving regulatory requirements and industry best practices.

7.1.2. Updates may be prompted by changes in technology, legal frameworks, or emerging risks.

7.2 Communication of Changes:

7.2.1. Game providers are promptly notified of any material changes to the KYB policy.

7.2.2. Communication channels include direct emails, an online portal, and notifications within the gaming platform.

8. Contact Information

8.1 Dedicated Support:

8.1.1. Game providers may direct any inquiries or concerns related to the KYB process to a dedicated support team.

8.1.2. The support team is available through multiple channels, including email, phone, and a secure online messaging system.

9. Technology and Innovation

9.1 Research and Development Initiatives:

9.1.1. Bridgepoint Solutions Ltd allocates resources to ongoing research and development initiatives focused on enhancing KYB processes.

9.1.2. Collaborations with technology partners and academia contribute to the exploration of innovative verification methodologies.

9.2 Emerging Technologies:

9.2.1. Bridgepoint Solutions Ltd actively monitors and evaluates emerging technologies for potential integration into the KYB process.

9.2.2. Pilot programs and testing are conducted to ensure the feasibility and effectiveness of new technologies.

10. Global Reach and Local Compliance

10.1 Jurisdiction-Specific KYB Protocols:

10.1.1. Bridgepoint Solutions Ltd maintains jurisdiction-specific KYB protocols that consider unique regulatory requirements.

10.1.2. Dedicated compliance officers for each jurisdiction oversee the implementation of these protocols.

10.2 Cross-Border Collaboration:

10.2.1. Bridgepoint Solutions Ltd engages in collaborative efforts with regulatory bodies across borders.

10.2.2. Cross-border information sharing agreements are established to facilitate the exchange of relevant KYB data.

11. Collaboration with Third-Party Auditors

11.1 Selection Criteria:

11.1.1. Criteria for selecting third-party auditors include independence, expertise in the gaming industry, and a proven track record of conducting similar assessments.

11.1.2. A rotating roster of auditors prevents conflicts of interest and ensures a diverse range of perspectives.

11.2 Audit Process:

11.2.1. Audits include a thorough examination of KYB procedures, interviews with relevant staff, and the review of documentation.

11.2.2. Audit reports are shared with regulatory bodies and integrated into ongoing improvement initiatives.

12. Continuous Improvement Initiatives

12.1 Feedback Mechanism:

12.1.1. Bridgepoint Solutions Ltd actively seeks feedback from game providers, regulatory bodies, and internal stakeholders.

12.1.2. An online feedback mechanism and regular surveys are employed to collect input on the KYB process.

12.2 Internal Review Board:

12.2.1. An internal review board is established to analyze feedback, identify areas for improvement, and recommend adjustments to KYB procedures.

12.2.2. Board members include representatives from legal, compliance, technology, and risk management departments.

13. Training and Awareness Programs

13.1 Comprehensive Training Modules:

13.1.1. Comprehensive training modules are developed for staff involved in the KYB process.

13.1.2. Training encompasses legal frameworks, industry trends, emerging threats, and ethical considerations.

13.2 Regular Training Updates:

13.2.1. Regular updates to training modules ensure that staff is informed about changes in regulatory requirements and technological advancements.

13.2.2. Certification programs are established to validate staff competence in KYB procedures.

14. Ethical Considerations

14.1 Non-Discrimination Commitment:

14.1.1. Bridgepoint Solutions Ltd commits to avoiding discriminatory, biased, or unfair practices in the KYB process.

14.1.2. A non-discrimination policy is established, ensuring that KYB assessments are conducted impartially.

14.2 Ethical Use of Data:

14.2.1. Bridgepoint Solutions Ltd adheres to ethical considerations in the use of KYB data.

14.2.2. Data is collected and processed only for legitimate purposes outlined in this policy.

15. Cross-Functional Collaboration

15.1 Interdepartmental Coordination:

15.1.1. The KYB process involves seamless coordination between legal, compliance, risk management, and technology departments.

15.1.2. Regular interdepartmental meetings and communication channels are established to facilitate collaboration.

15.2 Holistic Assessment Approach:

15.2.1. Cross-functional collaboration ensures a holistic assessment of game providers.

15.2.2. Legal, financial, operational, and reputational aspects are considered in making informed decisions during the KYB process.

16. Social Responsibility

16.1 Responsible Gaming Practices:

16.1.1. Bridgepoint Solutions Ltd actively promotes responsible gaming practices in the KYB process.

16.1.2. Measures are implemented to ensure the gaming ecosystem is inclusive, fair, and promotes a positive gaming experience for all users.

16.2 Community Engagement Initiatives:

16.2.1. Social responsibility initiatives include community engagement programs and partnerships with organizations promoting responsible gaming.

16.2.2. Contributions to social causes and awareness campaigns are integral to our commitment to social responsibility.

17. Legal Compliance Mechanism

17.1 Legal Oversight Team:

17.1.1. A dedicated legal oversight team monitors changes in gaming regulations globally.

17.1.2. This team ensures that the KYB process aligns with the most current legal requirements and industry standards.

17.2 Legal Compliance Audits:

17.2.1. Periodic legal compliance audits are conducted to assess the effectiveness of the KYB process.

17.2.2. Audit findings contribute to ongoing improvement initiatives.

18. Politically Exposed Persons (PEP) and International Sanctions Compliance

18.1 PEP Screening:

18.1.1. Bridgepoint Solutions Ltd incorporates Politically Exposed Person (PEP) screening as an integral part of the KYB process.

18.1.2. A specialized PEP database is utilized for identifying individuals with prominent political roles, and enhanced due diligence is applied to assess associated risks.

18.1.3 Bridgepoint Solutions Ltd does not offer its services to Politically Exposed Persons.

18.2 Enhanced Due Diligence (EDD):

18.2.1. Game providers identified as PEPs undergo enhanced due diligence procedures.

18.2.2. EDD includes a detailed assessment of the provider's financial transactions, business relationships, and the source of funds, aiming to ensure transparency and mitigate corruption risks.

18.3 International Sanctions Checks:

18.3.1. Bridgepoint Solutions Ltd conducts thorough international sanctions checks on game providers to ensure compliance with global sanctions regimes.

18.3.2. Sanctions screening involves continuous monitoring of official sanctions lists, both at the national and international levels, to identify any entities or individuals subject to sanctions.

Monitored sanctions list as follows:

- FATF
- The Council of Europe Select Committee of Experts on the Evaluation of Anti-Money Laundering Measures
- The EU Common Foreign & Security Policy (CFSP)
- The UN Security Council Sanctions Committees
- The International Money Laundering Information Network (IMOLIN)
- The International Monetary Fund (IMF)

18.4 Restricted Countries and Entities:

18.4.1. Game providers associated with countries or entities subject to international sanctions or restrictions are subject to additional scrutiny.

18.4.2. Decisions regarding partnerships with entities from sanctioned regions are made in accordance with applicable laws and international agreements.

18.5 Reporting Obligations:

18.5.1. Bridgepoint Solutions Ltd maintains a commitment to promptly report any identified PEPs or sanctioned entities to relevant regulatory authorities of Anjouan.

18.5.2. Reports include details of the identified individuals or entities, the findings of the investigation, and actions taken to address associated risks.

18.6 Collaboration with Sanctions Compliance Experts:

18.6.1. Bridgepoint Solutions Ltd collaborates with experts in sanctions compliance to ensure our procedures remain aligned with the latest developments in international sanctions regimes.

18.6.2. Regular consultations with sanctions experts contribute to the refinement of our processes and adherence to evolving compliance standards.

18.7 Continuous Monitoring of Sanctions Lists:

18.7.1. Automated systems are employed for continuous monitoring of updates to sanctions lists.

18.7.2. Any changes to sanctions lists are promptly reflected in our systems, enabling real-time identification of sanctioned entities.

18.8 Training on PEP and Sanctions Compliance:

18.8.1. Staff involved in the KYB process undergo specialized training on recognizing PEPs and understanding international sanctions regimes.

18.8.2. Training programs are updated regularly to reflect changes in regulatory requirements and emerging risks related to PEP and sanctions compliance.

18.9 Red Flags Indicators:

18.9.1. Red flags indicating potential PEP or sanctions-related risks are identified through ongoing monitoring and periodic reviews.

18.9.2. A structured system of red flags and escalation procedures is in place to ensure timely investigation and appropriate actions.

18.10 Legal Oversight for Sanctions Compliance:

18.10.1. Bridgepoint Solutions Ltd's legal oversight team actively monitors and assesses changes in international sanctions regulations.

18.10.2. Legal compliance audits specifically address the effectiveness of PEP and sanctions compliance measures, with findings contributing to continuous improvement initiatives.

18.11 Reporting to Regulatory Authorities:

18.11.1. Bridgepoint Solutions Ltd complies with reporting obligations to regulatory authorities regarding PEPs and sanctioned entities.

18.11.2. Reports submitted include comprehensive details of the findings, actions taken, and any additional information required by the relevant regulatory authorities.

18.11.3 Reports should be filed to the Anjouan Offshore Authority.