

AML POLICIES AND PROCEDURES

1. Customer Acceptance Policies

Only registered customers shall be allowed to wager using the Club's wagering facilities/portal. It is the policy of STC that a customer account shall not be opened or the transaction be cancelled, if any of the following circumstances exists:

- New customer account to be opened or transaction to be conducted is under anonymous or fictitious name
- Where STC is unable to verify the identity of the customer
- Where STC is unable to obtain the required information and/or documents due to non-cooperation of the customer or non-reliability of the data or information furnished to STC. In all cases, decision to close an account should be taken at the next higher level of authority.
- Positive match vs. OFAC/OFSI/SDN/Internal User Blacklist File or with any person with known criminal background

2. Prohibited Acts of STC

- STC shall not allow the following persons to access its wagering platform through its app:
 - 1. Customer below eighteen (18) years old; and
 - 2. Individual from sanctioned countries
- STC shall not accept wagers emanating outside the Malaysia and shall not be accessible in any way whatsoever outside Malaysia or in territories where wagering is prohibited;
- STC shall not allow paying of winnings to occur outside the territorial jurisdiction of the Malaysia;
- STC shall not allow the conduct of indecent and immoral activities which are contrary to public morals and interest;

3. Customer Identification

Customer identification process has to be carried out at different stages:

- While establishing a customer or business relationship;
- When STC becomes aware of circumstances which alter the current ML/TF/PF risk profile of a customer, including, but not limited to the following:
 - When there is an indication that the identity of the customer has changed.
 - When customer's transaction is not reasonably consistent with STC's knowledge of the customer.
 - Any other circumstances which could affect STC's assessment of the ML/TF/PF risk in relation to the customer.
- When STC suspects ML/TF/PF;
- When STC has doubt about the veracity or the adequacy of the previously-obtained customer information or identification data;
- When STC becomes aware of customer's adverse media exposure; and
- Prior to any "pay-out" / cash out / withdrawal.

Politically Exposed Persons (PEPs)

In addition to performing CDD measures, STC is also required to:

- Put in place risk management systems to determine whether a customer is a PEP;
- Obtain Senior Management approval before establishing or continuing such business relationships;
- Take reasonable measures to establish the source of wealth and the source of funds of customers identified as PEPs; and
- Conducting enhanced ongoing monitoring on that relationship.

Identity of PEPs may be validated using all known sources of information including third party commercially available CDD tools, such as, but not limited to World Check, and available open sources like Google.

In all instances, approving officers must ensure the KYC process for a specific customer was documented and the required information and documents were complied with.

4. Minimum Information And Documents Required From Customer/s

Customers shall open and maintain their wagering accounts only if their true and full identity is established. The following minimum information shall be required and confirmed with valid identification documents:

- Full Name
- Sex
- Date of Birth
- Place of Birth
- Current Address
- Permanent Address
- Contact Information
- Nationality
- Nature of Work
- Employer
- Business (if any)
- Source of income
- One (1) valid government-issued identification (ID) card

CUSTOMER DUE DILIGENCE

1. FOR LOW-RISK AND NORMAL-RISK CUSTOMER/S

STC shall create or open a wagering account under the true and full name of the customer upon presentation of acceptable identification card or official document as defined in this Manual or upon submission of other reliable, independent source documents, data or information.

Verification of the identity of the customer will be done after the establishment of the business relationship.

STC shall obtain at the time of customer registration all the minimum information and confirming this information with the valid identification documents hereof before establishing any business relationship.

2. ENHANCED DUE DILIGENCE (EDD) FOR HIGH-RISK CUSTOMER/S

EDD for high-risk customers is especially critical in understanding their transactions and implementing a suspicious transaction monitoring and reporting system. High-risk customers and their transactions should be reviewed more closely at account registration/onboarding and more frequently throughout the term of their relationship with STC. Although tagged as “high risk”, the Club may still proceed with the onboarding process but will be required to observe the EDD measures throughout the course of its relationship with the client.

3. STC SHALL APPLY EDD WHEN ANY OF THE FOLLOWING CIRCUMSTANCE EXISTS/OCCURS:

- a. Raises doubt as to the accuracy of any information or document provided;
- b. Justifies re-classification of the customer from low or normal risk to high-risk pursuant to AML or relevant rules and regulations or STC’s policy or when there is knowledge in the activity changes (e. g, low risk rate upon opening but later subject of suspicious transaction reporting). Should there be a need to maintain and change customer risk rating, approval of a Senior Officer is required.
- c. Any of the circumstance for the filing of suspicious transaction exists.
- d. Watchlist of individuals engaged in illegal activities or terrorist related activities as circularized by BNM, relevant regulators and other international entities or organizations such as Office of Foreign Assets Control (OFAC) of the US Department of Treasury and United Nations Security Council that requires Senior Officer’s approval.
- e. All complex, unusually large transactions, all unusual patterns of transactions, which have no apparent economic or unlawful purpose, and other transactions that may be considered suspicious.

When conducting EDD, gather documents to support the following:

- Sources of wealth and funds;
- Nature of occupation and/or business;
- Reason for intended of performed transaction; and
- Other identification information, which STC deems necessary to verify the identity of the customer.

4. VALIDATION PROCEDURES

Verification procedures for customers shall include, but not limited to, the following:

1. Confirming the date of birth from a duly authenticated official identification document.
2. Verifying the address through evaluation of utility bills, bank credit card statement, or other documents showing permanent address or through on-site visitation.
3. Contacting the customer by phone or email.

4. Determining the authenticity of the identification documents through validation of its issuance by requesting a certification from the issuing authority or by any other effective and reliable means.
5. Determining the veracity of the declared source of funds.

Where additional information cannot be obtained, or any information or document provided is false or falsified, or result of the validation process is unsatisfactory, STC shall not allow the onboarding/registration to proceed or initiate termination of the relationship with the customer (for existing customers) without prejudice to the reporting of an STR to the BNM when circumstances warrant.