

SABANT B.V.

KNOW YOUR CUSTOMER POLICY

4 February 2018

This Anti-Money Laundering Know-Your-Customer Policy (“KYC Policy”) is developed to prevent money laundering and terrorist financing activity on the Service by meeting the international and domestic legislation requirements and implementation of users identification procedure.

Sabant B.V. is a company operating duckdice.io. Services are provided to an account holder by Sabant B.V. located at (E-Commerce Park Vredenberg Z/N, Curacao). The registered address of a company is E-Commerce Park Vredenberg Z/N, Curacao under a License no. 8048/JAZ2018-018.

Correspondence address: Dr. M.J. Hugenholtzweg 25, Curacao.

As used in the KYC Policy, “Sabant B.V.”, “we”, “us” or “our” refers to the company Sabant B.V., including, without limitations, its owners, directors, investors, employees and other related persons. Depending upon the context, “Sabant B.V.” may also refer to the services, products, website, content or other materials provided by Sabant B.V.

The KYC Policy is an integral part of the Terms of Use. By accepting the Terms of Use you are automatically agreeing with this KYC Policy.

COMPANY NAME

Capitalized terms not otherwise defined in this KYC Policy have the meaning as they are defined in the Terms of Use.

I. LEGAL FRAMEWORK

The Curacao Anti-Money Laundering regime is set out in the following laws and regulations:

- (i) The National Ordinance Identification When Rendering Financial Services (“IFS”);
- (ii) The National Ordinance Reporting of Unusual Transactions (“RUT”) of October 1, 1997; and
- (iii) The Guidelines of the Bank of the Netherlands Antilles on the Detection and Deterrence of Money Laundering of 1996, which are based on Article 21, paragraph 2, section (e) of The National Ordinance Supervision of Banking and Credit Institutions of February 2, 1994.

II. USER IDENTIFICATION

Sabant B.V. reserves the right to take different measures, including user identification, to prevent money laundering, terrorist financing and other illicit activities by monitoring Users' suspicious activity, i.e. activity which has any elements or features of the Prohibited Conduct listed in the Anti-Fraud Policy.

Sabant B.V. does not identify each User in general. Nevertheless, Sabant B.V. shall verify Users whose activity is suspicious.

COMPANY NAME

Sabant B.V. reserves the right to suspend the Account that is involved in suspicious activity and request the owner of such Account to pass the KYC procedure.

III. KYC PROCEDURE

KYC procedure applies to Users suspected in committing illegal transactions. In order to remove any suspicions in regard to such users we may request following documents:

Personal identification documents of the User:

- Passport;
- National identity card;
- Driving License.

Proof of permanent address:

- Copy of an utility bill;
- Telephone bill;
- Bank statement.

Other KYC documents.

IV. TRANSACTION MONITORING

Sabant B.V. will diligently monitor transactions for suspicious activity. When such suspicious activity is detected the User will be obliged to pass the KYC procedure otherwise access to the Account and all Funds will be frozen until the dispute is resolved.

V. USE OF PERSONAL INFORMATION

All User's personal information and documents collected in connection with the KYC procedure will be used, stored and protected according to our Privacy Policy and in a full compliance with EU General Data Protection Regulation (GDPR).

VI. AMENDMENTS AND MODIFICATIONS

This KYC Policy may be modified or amended at any time, at the sole discretion of Sabant B.V. By using the Service you are acknowledge this is User responsibility to review the KYC Policy periodically and become aware of amendments and modifications.

If you do not wish to accept the modified and/or amended KYC Policy, you should not continue to use the Service. Your continued use of the Site and/or the Service following the posting of changes to the KYC Policy will be deemed as your acceptance of those changes.

SABANT B.V. ANTI-FRAUD POLICY

4 February 2018

I. Policy Statement

This Anti-Fraud Policy sets forth the policy of Sabant B.V. in preventing and deterring fraud, corruption, collusion, money laundering, terrorist financing and any other criminal conduct in Sabant B.V. activity.

Sabant B.V. has a commitment to high legal, ethical and moral standards. The public, partners of Sabant B.V. and Users have the right to expect that Sabant B.V. implement significant level of protection against any illicit activity.

The Anti-Fraud Policy has been implemented to comply with the current applicable local and international legislation.

II. Definitions

Capitalized terms used in this Anti-Fraud Policy have the following meaning:

Prohibited Conduct – any illicit conduct that includes fraud, corruption, money laundering, collusion, terrorist financing and any other criminal conduct.

Fraud – use of deception with the intention of pursuing personal interests and causing loss to the proper interests of Users and/or Sabant B.V..

Corruption – offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the action of another party.

Money laundering– a financial transaction scheme that aims to conceal the identity, source, and destination of illicitly-obtained money.

Collusion – arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.

Terrorist financing – provision or collection of funds, by any means, directly or indirectly, with the intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out any of the offences within the meaning of Articles 1 to 4 of Council Framework Decision 2002/475/JHA of 13 June 2002 on combating terrorism.

Criminal conduct – an offence in any part of the world or would constitute an offence in any part of the world if it occurred there.

Anti-Fraud Commissioner – a person authorised for monitoring, preventing and investigating Prohibited Conduct occurrences and responsible for the proper fulfilment of the Anti-Fraud Policy.

Capitalized terms not defined in this Anti-Fraud Policy have the meaning as they defined in the Terms of Use .

III. Responsibilities

The Anti-Fraud Commissioner shall have the primary responsibility for preventing, monitoring and investigating Prohibited Conduct occurrences. Due to abovementioned measures, we may perform identification of any User and/or transaction in accordance with the KYC Policy for detecting evidences of Prohibited Conduct.

In view of the Anti-Fraud Policy we are responsible for:

- Developing and maintaining effective internal controls to prevent Prohibited Conduct;
- Carrying out vigorous and prompt investigations if Prohibited Conduct occurs;
- Taking appropriate legal and/or disciplinary action against perpetrators of Prohibited Conduct;
- Ensuring the Anti-Fraud Commissioner has a duty to report any internal and external suspicions or incidents of Prohibited Conduct;
- Reporting any suspicions regarding Prohibited Conduct to the relevant state authorities.

IV. Fraud Investigation

Where reasonable suspicion that Prohibited Conduct has taken place, Sabant B.V. is entitled to investigate the matter thoroughly using recognised and legitimate investigative techniques.

The Anti-Fraud Commissioner is the first line of detection, investigation and protection in preventing Prohibited Conduct through the Users and transactions appraisal process.

In certain cases, third-party investigators may be engaged by Sabant B.V. in order to gather sufficient evidence to hand the case over to the proper authorities. Responsibility for the management of third parties rests with the Anti-Fraud Commissioner.

During the investigation process, the Anti-Fraud Commissioner shall be responsible for:

- collecting any information related to alleged or suspected Prohibited Conduct, including information about Users and certain transactions;
- reporting its findings to the Sabant B.V.'s management and relevant authorities, as well as any other third party on a need-to-know basis.

The Anti-Fraud Commissioner shall have full authority to open, pursue, close and report on any investigation on Prohibited Conduct within its remit without prior notice to, the consent of, or interference from any other person or entity. All investigations will be carried out objectively and confidentially.

We reserve the right to lock User's Funds on the Account while investigation is in process to ensure prompt and complete investigation procedure.

All Users are required to cooperate with the Anti-Fraud Commissioner promptly, fully and efficiently, including but not limited to answering relevant questions and complying with requests for information and records.

All information and documents collected and generated during the Prohibited Conduct investigation, not already in the public domain, shall be kept strictly confidential. The confidentiality of the information collected will be respected both in the interests of those concerned and the integrity of the investigation.

In particular, during a Prohibited Conduct investigation, confidentiality will be respected in so far as it would not be contrary to the interests of the investigation.

The Anti-Fraud Commissioner shall disclose such information and documents only to those persons or entities authorized to receive them or otherwise on a need-to-know basis.

V. User's Statement

BY USING OUR SERVICE YOU WARRANT AND GUARANTEE THAT YOU HAVE NO INTENTION TO COMMIT ANY OF PROHIBITED CONDUCT ACTS DESCRIBED HEREIN; FURTHERMORE, YOU CONSENT TO ANY CHECKS DUE TO INVESTIGATION UNDER THE ANTI-FRAUD POLICY AND YOU AGREE TO COOPERATE FULLY AND PROMPTLY WITH THE ANTI-FRAUD COMMISSIONER WITHIN SUCH INVESTIGATION.

VI. Amendments and Modifications

This Anti-Fraud Policy may be amended or modified at any time, at the sole discretion of Sabant B.V.. You acknowledge and agree that it is Users responsibility to review this Anti- Fraud Policy periodically and become aware of amendments and modifications.

If you do not wish to accept the amended/modified Anti-Fraud Policy, you should not continue to use the Service. Your continued use of the Site and or the Service following the posting of changes to the Anti-Fraud Policy will be deemed as your acceptance of those changes.
