

24 July 2018

ANTI-MONEY LAUNDERING POLICY (MALTA)

INTRODUCTION

VGW acknowledges the importance of the fight against money laundering and funding of terrorism, and fully supports both the international and national efforts aimed at deterring such crimes.

Money laundering and terrorist funding have been identified as risks, and in seeking to manage these risks, VGW adheres to the relevant laws, regulations, industry best practice, and strict ethical standards. VGW is conscious of the fact that the use of the gaming sector for money laundering and terrorist funding undermines the integrity of the entire sector and deters honest operators and investors.

VGW's firm commitment to contribute in combating money laundering and terrorist funding is driven by its desire to uphold the integrity of the gaming sector, to protect its reputation and to safeguard the interests of all its stakeholders.

OVERVIEW OF THE MALTESE REGULATORY SCENARIO

VGW is a limited liability company that is licenced under the Maltese Gaming Authority (MGA) and further regulated by the Financial Intelligence Analysis Unit (FIAU) within Malta.

Malta, which has been a Member State of the European Union since 1st May 2004, has enacted laws and regulations to transpose the Anti-Money Laundering EU Directives.

The principal legal requirements and obligations that form the basis of the VGW's Anti-Money Laundering ['AML'] and Combating the Funding of Terrorism ['CFT'] measures are contained in:

- The Prevention of Money Laundering Act 1994;
 - The Criminal Code;
 - The Dangerous Drugs Ordinance;
 - The Prevention of Money Laundering and Funding of Terrorism Regulations 2017;
- and
- The Implementing Procedures issued by the FIAU.

As a 'Subject Person' under The Prevention of Money Laundering and Funding of Terrorism Regulations 2017, VGW must strictly adhere to all the above legislation and guidance.

VGW'S AML AND CFT MEASURES

The measures implemented by VGW in respect of AML and CFT include the following:

- Written policies and procedures that are intended to detect and disrupt money laundering and/or terrorist funding;
 - The appointment of a Money Laundering Reporting Officer ['MLRO'] who is responsible for overseeing compliance with AML and CFT legislation, regulations, rules and industry guidance;
 - Establishing and maintaining a risk-based approach towards the assessment and management of money laundering and terrorist funding risks;
 - Having Identification, Verification and 'Know Your Customer' procedures, including Enhanced Due Diligence for those customers presenting a higher risk (explicitly including customer who are identified as having residential addresses within sanctioned countries);
 - Carrying out appropriate Due Diligence with respect to prospective and existing customers, staff and suppliers;
 - Procedures for identification and internal and external reporting in case where there is knowledge, suspicion or reasonable grounds to suspect that the offence of money laundering or funding of terrorism has been, is, or may be, committed;
 - The retention of Identification and Transactional Documentation as defined in the local legislation for the required statutory period;
 - Regular awareness and training sessions for all relevant employees to enable them to understand and fulfil their legal obligations, and to promote the culture and values adopted by VGW towards AML and CFT;
 - The blocking of transactions that are identified as involving a person who is subject to sanctions;
- and
- Independent periodic reviews of the VGW's compliance with AML and CFT procedures.

The implementation of the above AML and CFT measures is designed to ensure that VGW complies with the requirements and obligations set out in Maltese legislation, regulations, rules and industry guidance for the financial sector, and seeks to avoid even the inadvertent involvement of VGW in money laundering and/or terrorist funding.

This Policy Statement has been reviewed and approved by the Board of Directors. The Risk & Audit Committee is chaired by a director of VGW and has been entrusted by the Board of Directors with the responsibility for the implementation and oversight of VGW's Anti-Money Laundering and Combating the Funding of Terrorism measures.