



AML & KYC POLICY (ENGLISH VERSION)

universalrace.net

1. General

1.1 Policy Statement

It is the policy of Universal Soft SAC that all members of staff shall actively participate in preventing the services of Universal Soft SAC from being exploited by criminals and terrorists for money laundering purposes or used to fund a terrorist activity through winnings obtained through wagering on the company's website. This participation has as its objectives:

- Ensuring Universal Soft SAC's compliance with all applicable laws, statutory instruments of regulation, and requirements of the relevant supervisory body
- Protecting the company and all its staff as individuals from the risks associated with breaches of the law, regulations and supervisory requirements
- Preserving the good name of Universal Soft SAC against the risk of reputational damage presented by implication in money laundering and terrorist financing activities
- Making a positive contribution to the fight against crime and terrorism To achieve these objectives, it is the policy of Universal Soft SAC that:
- Every member of staff shall meet their personal obligations as appropriate to their role and position within the company
- Commercial considerations shall never be permitted to take precedence over Universal Soft SAC's anti-money laundering commitments
- The company shall appoint a Money Laundering Reporting Officer (MLRO), and a designate employee to ensure continuation during his / her absence, and they shall be afforded every assistance and cooperation by all members of staff in carrying out the duties of their appointments. Any reference to MLRO in this document, will include that of the designate employee should the MLRO be temporarily absent.

1.2 Definition

Universal Soft SAC believes that prior to implementing its Fraud Management Procedure, it is essential for it to identify what is, on the one hand, money laundering, and what, on the other hand, constitutes funding of terrorism.

Money laundering is the movement or concealment of criminal proceeds with the aim of obscuring the link between the crime and the generated funds, so as to be able to avail oneself of the profits of crime. Hence, the ultimate aim is that of obscuring the source of funds.

Funding of terrorism is the process of making funds or other assets available, directly or indirectly, to terrorist groups or individual terrorists to support them in their operations. This may take place through funds deriving from legitimate sources or from a combination of lawful and unlawful sources. Indeed, funding from legal sources is a key difference between terrorist organizations and traditional criminal organizations involved in money laundering operations. Although it would seem logical that funding from legitimate sources would not need to be laundered, there is nevertheless often a need for terrorists to obscure or disguise links between the organization or the individual

terrorist and its or his legitimate funding sources. Therefore, funding of terrorism is mostly concerned with obscuring the end recipient of the funds.

2. The Risk Based Approach

2.1 Definition

As per the applicable laws, Universal Soft SAC adopts a risk based approach. It hence identifies and analyses its risks and subsequently makes use of measures, policies, controls and procedures to curb any undesired risks, amongst which those related to the money laundering and funding of terrorism risks from materializing. The approach, allows for flexibility and significant discretion to be exercised by Universal Soft SAC. This in itself entails significant responsibility. It is up to Universal Soft SAC to show via adequate documentation, including but not limited to a risk analysis process, that it has assessed all risks and adequately put into place any measures to control these risks. In this regard this policy lays out the specific steps which Universal Soft SAC will adopt so as to ensure that its conduct is in line with the Risk Based Approach in respect of considering and identifying those risks that directly impinge on money laundering and funding of terrorism.

2.2 Risk Assessment Risk Management entails:

i) recognition of existence of risk ii) undertaking of a risk assessment, and iii)

implementing systems and strategies to manage and control the identified risks.

There is no doubt that the business of remote gaming is deemed risky. The risk assessment will however identify the key risks the company faces as well as the level of these risks, so that, consequently, the necessary measures are adopted to manage and control the identified risks. This procedure will specify the controls and processes that are to be followed so as to ensure that the risks which Universal Soft SAC has identified and which it will face as part of its operations will not materialize. Universal Soft SAC's organizational risk assessment which is to be approved by the Board of Directors takes the following factors into consideration:

i. Product/Service/Transaction Risk

Some gaming products/services/transactions are more vulnerable to criminal exploitation than others. These include, for instance, gaming products or services that allow the customer to influence the outcome of a game, be it one player alone or in collusion with others.

ii. Interface Risk

This refers to the channel through which Universal Soft SAC establishes a business relationship and/or through which transactions are carried out. Non face-to-face interactions, such as in respect of Universal Soft SAC's business interface, are no longer considered as automatically high risk, as long as technological measures and controls to address the heightened risk of identity fraud or impersonation are adopted. Universal Soft SAC will make sure to adopt a good mix of verification methods based on both documentary and electronic sources as mentioned below, so as to counter the mentioned risks. For instance, though Universal Soft SAC will make use of electronic databases, it is well aware that the databases only confirm that the identification details provided correspond to those of an actual person, and not that the customer is actually that individual. Provision of

additional identification documents will provide further proof that Universal Soft SAC was justified in considering that the customer is actually the persons he alleges to be.

iii. Geographical Risk

This is the risk posed to Universal Soft SAC by the geographical location of the customers, however also the geographical locations of its suppliers and service providers. The element to be considered in respect of this fraud management procedure is primarily that attributable to the customers and the source of funds of the said customers. The nationality, residence and place of birth of a customer should be taken into account as these might be indicative of a heightened geographical risk. Countries that have a weak anti-money laundering and counterfeit terrorism system, countries known to suffer from a significant level of corruption, and countries subject to international sanctions in connection with terrorism or the proliferation of weapons of mass destruction will be considered as high risk. The opposite is also true and hence may be considered as presenting a medium or low risk.

Risk assessments are 'works in progress'. Such assessments are to be constantly re-evaluated as new risks emerge. Risks may emerge due to changes in technology, which may render money laundering or the funding of terrorism attempts more easy to carry out. Other changes include the widening of the customer-base or the addition of games and payment methods which present a different risk profile from those already offered, which will thus require a revision of the business risk assessment. In the absence of any such changes, Universal Soft SAC will re-assess its business risk assessment at least once a year, so as to evaluate whether any changes thereto are necessary. In determining the level of risk posed by a customer, the accumulation of all of the relevant indicators will be taken into consideration. These together, determine the player's risk profile contributing to the totality of a player's risk profile.

iv. Customer Risk

This relates to the type of customer being provided with the service. The assessment of the risk posed by a natural person is generally based on the person's economic activity and/or source of wealth. In identifying the level of risk inherent in a relationship, Universal Soft SAC will be assessing what would be the likelihood that a customer would be able to launder proceeds of crime through Universal Soft SAC's service. A high earning customer who spends a fourth of his monthly wage in wagering is not likely to constitute a high risk, even if the amount being wagered is large. On the other hand, a minimum wage earner who spends his only wage on wagering will more likely constitute a high risk. Furthermore, the individual will be screened so as to determine whether he is a politically exposed person (PEP), or in any way associated to a PEP. Checks would also be carried out to ensure that the individual is not subject to any sanctions or other statutory measures.

3. Customer Due Diligence (CDD)

3.1 Procedure

The Fraud Management Procedure will now focus on the getting-to-know the customers procedure and identifying the risks related to their transactions and the origination of their funds, both from where the funds were obtained as well as the source of the funds from where the customer has remitted the funds.

As described above, a risk assessment can never be a one-size-fits all exercise. Universal Soft SAC will in this respect carry out a risk assessment upon entering into a business relationship with, or carrying out an occasional transaction for a customer. For the purposes of clarity, Universal Soft SAC will not be accepting corporate players only individual players. The mentioned risk assessment will allow Universal Soft SAC to develop a risk profile concerning the customer and categories the risk as low, medium or high, thereby allowing it to identify the controls which need to be adopted. The player's risk profile will not be completed upon registration. The registration part of the process will only signify the start of the collection of information, and as such the risk profile will be increased and refined with the development of the relationship with the player. Having said that, should there be a change in the business relationship entertained with the customer, which therefore also entails a change in the risk identified, the measures adopted to control the risk shall be adapted accordingly. Furthermore, on-going monitoring, as explained in more detail below, will ensure that any change in risk is spotted as soon as possible. The level of monitoring will be commensurate to the risk posed by the particular customer, but systems will be put in place so as to detect developing risky situations.

To start off Universal Soft SAC adopts CDD measures so as to determine, who its customers are. All details collected at registration stage are used to build the customer profile. Further customer profiling is done, based on the customer's activity and also on the particular behavioral aspects. This profiling aspect will assist in determining the risk attached to the particular player and thus also facilitate in the identification of future unusual behavior. CDD is divided into the below three parts:

A. Identification and Verification of the Customer

Identification consists in the collection of the player's personal details. This information is collected during the registration process. The personal information to be collected is to start off the Know Your Client (KYC) procedure, which includes the collection of the following personal details:

- a. Name and surname
- b. Permanent residential address
- c. Date of birth, as the player has to be over eighteen years of age (or any other age as applicable in the player's particular jurisdiction)
- d. Valid email address
- e. Place of birth
- f. Nationality, and
- g. Identity reference number where applicable.

Once the above information is provided, Universal Soft SAC will first ascertain whether the individual in question is a Politically Exposed Person (PEP), a family member of the PEP, or a close business associate of the PEP. A reliable electronic database, such as [opensanctions.org](https://www.opensanctions.org) and [complyadvantage.com](https://www.complyadvantage.com) will be integrated and made use of in this regard. If it is determined that an individual is a PEP or in any way related to a PEP, then the individual will be deemed himself / herself a PEP and will not be allowed to register as a player with Universal Soft SAC, as the latter has a strict

policy of not accepting PEPs as players. This therefore means that determination as to whether an individual is a PEP (as per above definition) will take place at registration stage.

The account will be formally opened once the player's e-mail has been verified. In any situation where the player is immediately identified as being high risk, Universal Soft SAC may immediately ask for additional personal details and for verification of the same details provided. In any case, Universal Soft SAC will ensure that it is at all times able to determine that the customer is who he claims to be and that the measures adopted are effective enough to counteract the risk of identity fraud and impersonation.

Verification consists in confirming the personal details collected for identification purposes through the use of independent data, information and documentation obtained from reliable sources. If inconsistencies in the personal information provided by the customer are identified, Universal Soft SAC will consider whether to adopt additional identification and verification measures.

This will take place by either of two ways: i. Documentary sources,

As a rule, this method of verification will be carried out by making reference to Government- issued documents containing photographic image together with the player's identity (e.g. passport, identity card, driving licence etc). If the player's residential address cannot be verified by using any one of the just mentioned documents, Universal Soft SAC will ask for alternative reliable documents such as a recent utility bill, bank account statements, correspondence from Government or public entities etc, so as to be able to verify the address. The documents requested will be received by electronic mail and if deemed necessary notarized documents may be requested for.

Universal Soft SAC will ensure that all documents received are clear, legible, of good quality, and are authentic or reflect authentic ones. Some documents, such as passports may be easier to verify as these can be checked against other sources. In other cases, such as with regards to utility bills, the verification process may be less easy. Universal Soft SAC will carry out additional checks by using specific software programs / applications; that will be integrated as a solution to assist users in conducting their work.

In respect of the validity of the information provided, Universal Soft SAC will also consider other data that is collected from the player such as geo-location, IP address data etc. that should under normal circumstances corroborate the data contained in the documents provided by the player. There will be exceptions, where the IP address will not tally with the country / location. Such instances would need to be checked on a case by case basis and verification / clarification will be obtained directly from the player.

ii. Electronic means

These include sources like E-ID or Bank-ID and electronic commercial databases. Universal Soft SAC is well aware that the reliability of these databases may not always be the best. In this regard it will consider what source of information is feeding into the database and whether such data is generally known to be maintained up to date. When making use of the mentioned electronic databases, Universal Soft SAC will also make use of other documentary evidence for better confirmation / reliability. This is because a positive result on the electronic database will only mean that there is an individual whose personal details correspond to those provided by the client, but not that the client is that individual. On the other hand, when using electronic sources like E-ID and Bank-ID,

which can be accessed only through the use of credentials held by a specific individual, no additional verification means will be requested, as these sources are deemed to provide a sufficiently strong link.

B. Obtaining information on the purpose and intended nature of the business relationship

The objective behind the opening of a gaming account is quite self-evident and hence no clarifications as to why an account opening request has been made will be sought. However, there may be an ulterior motive on the basis of which the account was opened possibly even being, for money laundering or funding of terrorism. If Universal Soft SAC has any suspicion that such an ulterior motive subsists, then it will conduct further investigation and request for additional data and documentations to either justify its suspicions or else to confirm that indeed there are no justifiable indications of an illegal motive.

There is no specific timeframe or period when these additional checks will be conducted, as these will be simply carried out when the suspicion arises. Hence the investigation may need to be conducted upon registration, whereas in other instances it will not need to be carried out until the specific mandatory AML thresholds are reached.

In the event that any checks are to be carried out prior to the mandatory period, Universal Soft SAC will first collect sufficient information, and where it is necessary, documentation to establish the player's source of wealth. Identifying the player's source of wealth consists of determining the activities which generate the player's net worth, which will then lead Universal Soft SAC to determine whether this amount of wealth justifies his projected and actual level of account activity. Universal Soft SAC will at this stage also profile the player within the player risk matrix (as per the table in the next section). Where the risk determined following the checks is medium or low, Universal Soft SAC will accept a declaration from the customer with details, such as nature of employment/business, and a declaration regarding annual salary. Searches on professional networks and social media will also be used for verification purposes. If the risk is high or Universal Soft SAC has doubts as to the veracity of the information collected, the player will be requested to provide further independent and reliable documentation which evidences the alleged source of wealth. So for instance the individual may be asked to mail out a copy of his payslip or providing such other documented evidence to confirm his declaration.

C. Ongoing Monitoring

This ultimately entails the monitoring of clients' transactions, personal details and changes in their circumstances or wagering preferences, so as to ensure that they are consistent with the anticipated activity, and if not, to identify why the changes have occurred. The aim is that subjectively unusual large transactions, changes in gaming patterns and other 'out-of-the-ordinary' activities will be identified and analyzed. In this respect, it is important for Universal Soft SAC to ensure that the players' information is maintained up-to-date. It will encourage and even oblige players via the terms & conditions to inform Universal Soft SAC of any changes, and possibly provide documentation to confirm the same. Through the monitoring process, the risk level will be reviewed and an analysis of whether the previously established risk rating should be amended or not will be carried out. Any inconsistencies in information would need to be justified and Universal Soft SAC reserves the right to request for further corroborating evidence.

Adequate ongoing monitoring also entails carefully examining the player's transactions and playing patterns so as to ensure that these are in line with Universal Soft SAC's knowledge of the player, his gaming activity and risk profile. If the two do not coincide, then Universal Soft SAC will similarly question the situation. Whenever Universal Soft SAC asks for further information, it will always take note of its findings so as to evidence its compliance. Should any identified inconsistency persist without it being successfully addressed, Universal Soft SAC will analyze whether any report is to be submitted to the relevant authorities and also take a decision whether it deems it necessary to suspend the player's account.

The below screenshots provide an example how Universal Soft SAC will be able to keep track of which due diligence documents have been requested, received, and any other related notes:

Lastly, with regards to PEPs, a scenario may arise wherein a player may not have been considered to be a PEP at registration stage, but becomes one during the course of the business relationship. If, when conducting on-going monitoring Universal Soft SAC becomes aware of such a change, Universal Soft SAC will terminate its business relationship as it has a strict policy of not accepting PEPs as players. Should it be the case that for some reason or another, the individual had not been identified to be PEP even if s/he was a PEP at registration stage, but is consequently identified to be such, Universal Soft SAC will void any winnings obtained by the individual, and will then transfer deposited funds, to the original source from where the funds originated. It will consequently close the player's account, as per the procedure laid out in section 3.3 below.

3.2 Timing and Application of CDD measures

As described further above the player's account will be successfully opened once the player registers providing the requested basic personal information, and subsequently verifying his email address via the e-mail activation link. The system is set to prevent minors from registering by rejecting any date of birth inserted which would signify that the player is under eighteen years of age (or any other age as per specific legislation – such as Latvia – 21 years of age.)

Any player details' verification (with the exception of PEP confirmations) may occur at any point in time at Universal Soft SAC's discretion. However at least, it must definitely be carried out when the amount deposited by the players reaches the cumulative value of € 2,000. It makes no difference whether such deposits have been carried out via a single operation or several operations which appear to be linked or otherwise. Universal Soft SAC will hence put in place a system which calculates on a daily basis, whether, the player has reached the deposit limit of € 2,000 on his account. Another important factor that the system will include is, the identification of possible multiple accounts, which accounts would have been specifically created to either defraud the company through bonuses abuse or specifically to never reach the required deposit limit of €2,000, and hence ensuring that the account remains unverified.

Up until the time that this threshold is reached, Universal Soft SAC will conduct ongoing monitoring as per point C of section 3.1 above, so as to ensure that player information is still correct. Furthermore, if Universal Soft SAC notices at any point in time any inconsistencies between the information provided by the player and any other information it acquires, Universal Soft SAC will question the discrepancies and take any remedial action it deems necessary. In addition, should it suspect money laundering or funding of terrorism, it will follow the procedure laid out in section 4 below.

Once the mentioned threshold is reached, the player's risk profile will be confirmed, upon the basis of the risk assessment carried out as per section 2.2 above. The latter shall take place prior to the lapse of thirty days from when the € 2,000 threshold is reached. The risk assessment will determine whether the risk posed by the individual is low, medium or high. The measures adopted to control the risk in question vary, as per the table laid out hereunder:

Risk Identified Measures Adopted

- | | |
|--------|---|
| Low | <ul style="list-style-type: none">• Verification of Personal Details• On-Going Monitoring is carried out to ensure relationship remains Low Risk and threshold is not exceeded again• Any suspected cases of money laundering or funding of terrorism are to be reported |
| Medium | <ul style="list-style-type: none">• Additional personal details as deemed necessary by Universal Soft SAC are collected• Verification of Personal Details takes place by using documents containing photographs of the individual• Source of Wealth information is collected• Ongoing monitoring is carried out so as to be able to detect unusual activities, and also to keep information and profile updated• Any suspected cases of money laundering or funding of terrorism are to be reported |
| High | <ul style="list-style-type: none">• Additional personal details as deemed necessary by Universal Soft SAC are collected• Verification of Personal Details takes place by using documents containing photographs of the individual• Source of Wealth information and documentation is collected• Ongoing monitoring is carried out even more thoroughly and at more frequent intervals than that carried out for medium risk, so as to be able to detect unusual activities, and also to keep information and profile updated• Source of Funds may need to be determined for specific transactions |

Universal Soft SAC will allow players to continue using their gaming account while it is still obtaining necessary information and/or documentation from the player concerned. However, up until the time when Universal Soft SAC actually obtains the mentioned information and/or documentation, and verifies the player's identification, it will not allow the player to effect any withdrawals from his account, independently of the amount involved. Furthermore, if thirty days have lapsed from when the € 2,000 threshold has been met, and the player has not provided the requested information and/or documentation Universal Soft SAC will terminate the business relationship with the player, following the procedure laid out in the next section.

3.3 Termination of business relationship

Universal Soft SAC will terminate its business relationship with a player if he fails to provide the requested information and/or documentation, which Universal Soft SAC has repeatedly requested of him. Universal Soft SAC will void any winnings and will then transfer deposited funds to the original source from where the funds originated. All approval for such action must be taken by senior management and only once it has ascertained that there is no restriction on the transfer of the funds. If Universal Soft SAC finds it impossible to remit the funds back to the player through the same channels, it will, as a measure of last resort, remit the funds to a single account held with a credit or financial institution in a reputable jurisdiction in the player's name. If no such account is made available then the funds will continue to be held in the players' name. The funds will continue to be held on account until the player provides adequate details for the transfer. If this never materializes then after the lapse of 30 months any funds remaining on account will be remitted to the Malta Gaming Authority (CURACAO GAMING AUTHORITY). Whenever remitting such funds, Universal Soft SAC will indicate in the instructions accompanying the funds that these are being remitted due to inability to complete CDD. Universal Soft SAC will also consider whether there are grounds for filing a Suspicious Transaction Report (STR), as per the procedure laid out hereunder.

3.4 B2B relationships

Universal Soft SAC will also conduct due diligence exercises before entering into any business relationships with third parties. These exercises will be carried out by senior management together with the legal department and the MLRO. Just like CDD, business due diligence (BDD) will seek to identify what risks would emerge should Universal Soft SAC engage in business with the third party. In carrying out this assessment, it will be determined whether the source, nature and volume of business to be introduced via the third party can be established. Universal Soft SAC will also give a lot of weight to the fact that a supplier is already an approved supplier as per CURACAO GAMING AUTHORITY requirements. It is also considered positive if a supplier that is presently not approved seeks approval at the point in time when contracting with Universal Soft SAC. The assessment will also seek to establish whether the third party has business dealings with other third parties which are known not to be reputable, or if the third party conducts its business in or from a non-reputable jurisdiction. In this regard, Universal Soft SAC will ask the third party to provide it with original/certified copies of all the necessary documentation, including, company incorporation certificate, memorandum and articles of association, certificate of good standing, annual financial statements, identification of officers of the company as well as a shareholders list, and a bank reference letter, confirming that the company's affairs are dealt with in a good manner. Once it has been determined that the third party conducts business in a manner which will not jeopardize Universal Soft SAC's position, then the parties will agree on the terms of the business relationship and sign the relevant agreements and documentation. As part of the BDD, Universal Soft SAC will conduct ongoing monitoring to ensure that the third party still conducts its business in a diligent manner, based on their own experience of the manner in which the services are provided. Furthermore, Universal Soft SAC also reserves the right to include a Right to Audit clause in the agreement it signs with the third party, if this is deemed necessary.

Any anti-money laundering review conducted will be separately noted in the third party's file. In any case, Universal Soft SAC will always reserve its right to terminate its business relationship with any third party should it feel that in conducting business with the third party, it is putting its compliance with its anti-money laundering and funding of terrorism obligations at risk. Notification to the CURACAO GAMING AUTHORITY will be given as per the agreement and as per the requirements of the same authority.

3.5 Reliance and agents

Universal Soft SAC may decide to rely on the information and documentation collected at customer on-boarding stage by a third party, and/or engage an agent. In either of the cases, Universal Soft SAC will ensure that the third party is established in an EU Member State or a reputable jurisdiction which adopts the same anti-money laundering or countering of funding of terrorism measures as laid out in the applicable Maltese laws, or measures which are equivalent thereto. In determining the latter, Universal Soft SAC will rely on reputable sources such as the Financial Action Task Force on Money laundering evaluation reports, IMF Country Reports etc.

If Universal Soft SAC decides to rely on information provided by a third party, it may still request the player to provide it with any verification documents. In such circumstances, Universal Soft SAC will still conduct the customer-based risk assessment itself, determine the customer's risk rating and conduct on-going monitoring. The relationship between Universal Soft SAC and the third party will be laid out in an agreement, and one of the conditions will be that of the third party providing Universal Soft SAC with documents concerning players, immediately upon request. Universal Soft SAC will also include a Right to Audit clause in the agreement and will indeed periodically test this arrangement, to ensure that the necessary player personal details and documentation is being collected as per the agreed specifications.

A copy of this procedure will also be provided to the third party so as to ensure that the CDD requirements and applicable thresholds are adequately communicated, and thus the third party will never have the excuse that they were not aware of what the applicable company requirements are. Universal Soft SAC may, whenever allowed by law, opt to use the services of agents in order to on-board or service customers. Universal Soft SAC may request the agent to carry out the necessary anti-money laundering/countering of funding of terrorism controls and adoption of measures when on-boarding or servicing one of Universal Soft SAC's customers. In any case however, Universal Soft SAC will ensure that any application of CDD measures is carried out diligently and as required by the applicable laws. Universal Soft SAC is well aware that in exercising reliance or making use of agents, it remains ultimately responsible for ensuring it is adhering to its anti-money laundering/countering of funding of terrorism obligations.

4. Reporting suspicious activity and transactions

4.1 Appointment of the Money Laundering Reporting Officer (MLRO)

While the detailed description of the responsibilities of the MLRO is laid out in the Human Resources Roles and Responsibilities Policy, the MLRO's main responsibility will be that of considering any internal reports of unusual or suspicious transactions that are raised within the company, and, following up on these reports and also filing a STR with the Financial Intelligence Analysis Unit (FIAU), when this is deemed necessary. The MLRO, will also act as the main channel through which any communications with the FIAU will be conducted. He will ensure that Universal Soft SAC is effectively implementing the policies and procedures which it has adopted in order to address its anti-money laundering/countering of funding of terrorism obligations. The MLRO will be responsible for monitoring any updates on sanctions

lists such as that of the Financial Action Task Force (FATF) and the Office of Foreign Assets Control (OFAC). He will then update the rest of the staff on any amendments to the sanctions lists and any fundamental changes to the applicable law. Universal Soft SAC will ensure that the individual

appointed as MLRO enjoys sufficient seniority and command to be able to act independently of its management.

The MLRO will have access to all the necessary information/documentation and company employees to effectively carry out his obligations. Universal Soft SAC has also appointed a designate employee who would be able to act as the MLRO during the MLRO's absence. The MLRO's as well as the designate employee's appointments will be made known to the CURACAO GAMING AUTHORITY , so that the CURACAO GAMING AUTHORITY , as well as the FIAU, may address queries and requests directly to them, whenever the need arises. Thus, such individuals will act as a contact point between Universal Soft SAC and the relevant authorities in matters related to anti-money laundering/countering of funding of terrorism.

4.2 Reporting suspicious activity and transactions

Universal Soft SAC may develop a suspicion or have reasonable grounds to suspect that activity on an account is linked to money laundering or funding of terrorism. At that point in time, Universal Soft SAC will ensure that all CDD requirements are met, regardless of whether any applicable threshold has been met. It will consequently submit a STR as soon as possible.

4.2.1 Internal Reporting Procedures

As laid out in further detail in section 6 below, all staff communicating with the players, or having access to information about clients' affairs, will receive anti-money laundering training. In this manner, they would be able to identify which player's action should reasonably lead them to suspect that money laundering or funding of terrorism activity is being attempted or has been carried out. For instance, they would be expected to realise that if a player attempts to register more than one account with Universal Soft SAC, or if he deposits considerable amounts during a single session by means of multiple pre-paid cards, then such actions should constitute indicators or red flags which should lead them to question the player's behavior. At that point, the employee may subtly seek explanations from the player, without disclosing his suspicion to the player. This disclosure is forbidden whether directly or indirectly, and hence all members of staff must be astute in this respect. If the officer does not manage to obtain any convincing information, and after full consideration the officer is still suspicious of foul play, then at that point he shall inform his immediate superior. Obviously enough, prior to reporting to his superior, the employee will have to be satisfied that there is a clear indication of intent to circumvent the safeguards, and that use of the financial system for criminal purposes is present.

There may be instances wherein the manager disagrees with the officer, but the officer still feels he has reasonable grounds to suspect wrongdoing. In such circumstances, the employee is to inform the MLRO anyway of his suspicions. The employee may discuss the matter directly with the MLRO and is in no way obliged to inform or involve his manager. On receipt of the internal report from the employee, the MLRO will acknowledge its receipt in writing, referring to the report by its date and unique file number, without including the name of the person(s) suspected. In this manner, the officer's legal obligation to report will be considered to have been fulfilled. The employee will only be allowed to discuss the matter internally with management, or with other employees, if at all deemed necessary, after having obtained approval from the MLRO. Any external discussions are prohibited and will be considered as tipping off. If circumstances arise that make it difficult for the employee to communicate with the player without risking any possibility of tipping off, the

employee is to seek advice and follow the MLRO's instructions. This procedure shall constitute Universal Soft SAC's internal procedure for reporting suspicious activity and transactions.

4.2.2 External Reporting Procedures

As already described in the previous section, the MLRO shall receive and evaluate internal suspicion reports. He will open and maintain a log detailing the progress related to each report, noting down any information which needs to be documented so as to ensure that an adequate track record of the reasons leading to his decision are maintained. Such documentation may also be used to assist the Authorities in any analysis or investigation of the suspected money laundering or funding of terrorism, when such details are directly requested from the MLRO. This log shall be held by the MLRO and shall only be accessible to him, and will not form part of the player's file. The MLRO shall gather all the necessary information and pose any questions to any of Universal Soft SAC's employees' as part of his investigation. The employees (whether those having submitted the internal report or otherwise) shall provide the MLRO with relevant information. In doing so, they will not be breaching their obligation of client confidentiality. Once the MLRO decides that there are reasonable grounds which warrant the submission of a STR via the Authority's online submission system, he shall make this formal disclosure to the FIAU on behalf of Universal Soft SAC. No copies of either the internal or external reports will be made. The MLRO will keep such records secure. The MLRO shall, where appropriate, inform the originator of the internal report whether or not a formal disclosure has been made. Following a formal disclosure, the MLRO shall take such actions as required by the Authorities in connection with the disclosure and accordingly follow their instructions.

4.2.3 What should give rise to a suspicious activity?

For clarity's sake, STR reporting will cover:

1. Any activity which leads Universal Soft SAC to think that a person is linked to money laundering/funding of terrorism or to any proceeds of crime, or that either of the two is being committed, or may be committed, independently of whether any transactions have taken place or otherwise.
2. Any instance wherein objective facts will lead Universal Soft SAC to have reasonable grounds to suspect that money laundering/funding of terrorism or of proceeds of crime may be taking place.

Universal Soft SAC shall be obliged to submit an STR with the FIAU with regards to activity carried out on the basis of its Curacao Gaming Licence, and accordingly notify the CURACAO GAMING AUTHORITY, when deemed necessary and as per instructions given by the FIAU.

4.2.4 Stopping/continuing work following a suspicion

Due to the nature of the gaming products and services offered by Universal Soft SAC, and the nature of the transactions in question, Universal Soft SAC will not always be in a position to refrain from carrying out a pending transaction prior to the filing of a STR. This is because should Universal Soft SAC refrain from accepting a transaction when it usually does so instantly, the delay in acceptance may trigger the player into knowing that he is being suspected of fraudulent activity. Any delay may prejudice an analysis or investigation of the suspected transaction. Hence, whenever Universal Soft SAC suspects money laundering/funding of terrorism, then Universal Soft SAC will still proceed with

executing the suspected transaction. However, Universal Soft SAC will, submit an STR to the FIAU immediately after the execution of the transaction.

4.2.5 Prohibition of Disclosure

Universal Soft SAC will not disclose any details or information in connection with a STR or a request for information made by the FIAU. This prohibition of disclosure applies with regards to both the suspected player and any other third party, and this independently of any other regulatory or contractual obligation that Universal Soft SAC may be subjected to. Universal Soft SAC will only make the necessary disclosures to the CURACAO GAMING AUTHORITY, as prescribed by the applicable law. It will also be extremely careful when dealing with a player that is the subject of a STR or FIAU enquiry. As explained above, this is so as not to prejudice an analysis or investigation. The exceptional cases wherein the prohibition of disclosure does not apply are mentioned under Regulation 16(2) of the Prevention of Money Laundering and Funding of Terrorism Regulations, 2017, and will apply as follows:

- ✓ Disclosures to the supervisory Authority, in this case the CURACAO GAMING AUTHORITY;
- ✓ Disclosures between subject persons in the same group;
- ✓ Disclosures between a subject person undertaking a 'relevant activity' and another person undertaking similar activities and where similar requirements are imposed by the jurisdiction. The persons being within the same legal person or within a larger structure to which they belong, which have common, ownership, management;
- ✓ Sharing of information based on the same transaction, where the subject persons and the related activity are subject to the same legal obligations and the persons are of the same professional category and hence have similar obligations in respect of professional secrecy and data protection;
- ✓ Disclosures by a subject person in the course of proceedings initiated in respect of delays in carrying out transactions, where the subject person was actually following instructions as per FIAU;
- ✓ Disclosure by a subject person to a supervisory authority as per the request made by the supervisory authority, in this respect, the CURACAO GAMING AUTHORITY.

Universal Soft SAC will also consider carefully any of the measures which it decides to adopt vis-a-vis the suspected player, consequent to the submission of a STR. So as not to jeopardise any investigation, prior to undertaking any such action, Universal Soft SAC will seek guidance from the FIAU's analysts. Universal Soft SAC will, as much as possible, consider such actions as a measure of last resort, and not unnecessarily burden the FIAU with every small suspicion. In cases of minor suspicions not warranting reporting, it will instead increase on-going monitoring and only submit STRs to the FIAU once a suspicion persists or the indicators increase. Universal Soft SAC will ensure proper documentation of such internal decisionmaking.

5. Payout Management Procedure

Whenever a player makes a withdrawal request, regardless of the payment method used, Universal Soft SAC will, prior to acceding to such a request, ensure that the institution to which the funds are to be remitted is situated in a reputable jurisdiction and has equivalent anti- money laundering/counterfeit terrorism requirements as are applicable to Universal Soft SAC. Obviously enough this also ties in to the institutions from where player deposits are accepted. As a general rule, withdrawals will only be processed to the same source from where the funds originated. This measure will limit the risk of successful money laundering or funding of terrorism withdrawals.

Furthermore, no cash deposits or withdrawals will be affected. Withdrawal requests shall be carried out as per the following procedure:

- ✓ Withdrawal requests will be processed immediately upon request.
- ✓ No cash withdrawals can be processed under any circumstances. Cash transactions are specifically prohibited and in fact there are no methods that players may apply to process any fund transfers in cash.
- ✓ The gameplay will be checked as well as all financial transactions.
- ✓ Universal Soft SAC will also consider whether individuals are playing fairly, or whether the gaming system has in any way been manipulated, or whether the system is, alternatively, malfunctioning, and the player was in any way taking advantage of any bug without, accordingly informing Universal Soft SAC, as per the Terms & Conditions' requirements.
- ✓ Reference will also be made as to whether CDD verification has been conducted. If it has not yet been carried out since the deposit requirement was not reached, a management decision is taken as to whether it is deemed necessary to conduct CDD verification at this stage prior to completing the withdrawal process.
- ✓ The risk assessment is also conducted / checked to ensure that the player's risk vis-a- vis his activity with Universal Soft SAC is determined.
- ✓ Applicable CDD requirements will be as per section 3.2 above.
- ✓ If the player does not provide the necessary documents for verification to take place, when requested, or if it becomes clear that verification cannot take place because the individual has acted fraudulently, withdrawals will not be processed. Once it becomes clear to Universal Soft SAC that the individual was attempting to act fraudulently, it will block the player's account, void all winnings and simply return the deposit to the account from where the funds originated.
- ✓ In the event that withdrawals cannot be processed to the account from where the funds originated, such as when the player is making use of Mastercard or Paysafecard, then Universal Soft SAC will formally request for player verification documents and also request for details of another payment system that may be confirmed to be in the player's name and hence minimising the risk of remitting funds to an individual that is different from the person that had originally remitted the deposits. This process is in place to discourage credit card theft and identity theft.

6. Training

It is the policy of Universal Soft SAC that all staff who have client contact, or access to information about clients' affairs, shall receive anti-money laundering training to ensure that their knowledge and understanding is at an appropriate level. Training will furthermore be provided at least once a year so as to maintain awareness and ensure that the company's legal obligations are met. Any training given will take into consideration the practicality of assigning different tasks to staff as per their role, and all information accessible will be on a need-to-know basis. However, training about the whole process will be provided to employees, so as to ensure that each officer has a holistic understanding of the due diligence, KYC, AML and payout procedures, since these are very closely related.

In light of the seriousness of the obligations placed by law and regulations, and the gravity of the possible penalties, the MLRO shall ensure that information about these obligations is available to all members of staff at all times. The MLRO will also ensure that on-going training is provided, that is, as and when the need arises, even based on direct requests made by employees.

The training programs will include testing to ensure that each individual has achieved the appropriate level of knowledge and understanding. Testing may be conducted in various ways, whether through formal testing, assessment via discussion of case studies, or other means. Special consideration will be given to the training needs of senior management, and of the compliance team, whose knowledge and understanding must be most thorough.

The Human Resources (HR) Department will:

- ✓ inform every member of staff of the training programs that they are required to undertake, and the timetable for completion;
- ✓ check that every member of staff has completed the training programs assigned to them, issuing reminders to any who have not completed the programs as per the applicable timetable;
- ✓ keep records of training completed, including the results of tests or other evaluations demonstrating that each individual has achieved an appropriate level of competence;
- ✓ update employee personal files with details of training undertaken and results obtained where applicable;
- ✓ refer to senior management any cases where members of staff fail to respond or whose results are unsatisfactory, to issue reprimands or provide additional training as per the individual case.

The MLRO will be provided with full access to all records held by the HR Department.

On completion of a training cycle, the HR Department will ensure the continuity of ongoing training and also obtain updates from the MLRO in respect of changes happening in the field, so that the HR may ensure that up-to-date training is organized and provided to all members of staff.

Line managers will also provide feedback to the HR Department in respect of: ✓ the effectiveness of the programs completed; and

- ✓ make suggestions as to different methods of delivery.

Line managers will supplement the training provided to support staff by giving guidance on a day-to-day basis on:

- ✓ the type of client instructions and transactions that count as 'significant' and so should be brought to their attention
- ✓ identifying client instructions and transactions which, although not of a nature normally counting as 'significant', are in some way unusual or anomalous and should be considered with regard to possible suspicion of money laundering or funding of terrorism. The MLRO will determine the training needs for his/her own role, and ensure that he/she undergoes Continued Professional Education (CPE) as required to fulfil his/her legal obligations.

The aim of all training provided is to ensure that staff is capable of identifying any attempted or actual money laundering or funding of terrorism activity exercised by players when using Universal Soft SAC's services.

7. Keeping records of client due diligence information

When information is being collected for CDD purposes, the responsible service staff will:

- ✓ keep records in the client file.
- ✓ record instances where information requested has not been forthcoming, or explanations provided have not been satisfactory.
- ✓ ensure that all records are kept in a consistent manner so that they are accessible by and comprehensible to other authorized members of staff, including the MLRO.

Transaction and customer records from the date of transaction and end of business relationship respectively, are kept as long as Universal Soft SAC has a valid legal reason to keep such records. Such reasons are limited only to legal obligations which Universal Soft SAC needs to abide by, such as, anti-money laundering obligations, taxation regulations etc. The records are consequently archived. The players have the possibility of accessing transactions from their profile for a period of 2 months. Following that time lapse, details about the transactions may be requested through customer support on gmbvcuracao@gmail.com.

Should Universal Soft SAC determine that a player's record needs to be retained for a prolonged period of time due to the fact that a report has been filed with regards to that player, all relevant records will be retained on the live system and not archived. This is done so as to ensure that Universal Soft SAC complies with its anti-money laundering obligations. Once the enquiry / investigation has been completed and the MLRO has been accordingly informed, then the records will be treated similar to all other information and the same archiving policy will then apply.

8. Monitoring and management of compliance

Compliance with this policy shall be constantly tested and ensured. The Board of Directors reserves the right to engage external auditors to examine whether the company is complying with the measures laid out in this procedure. The findings of such audits and any appropriate

recommendations for action will be reported to the Board of Directors. The latter will then request for feedback from management in respect of the suggestions made by the auditors. Based on the recommendations as well as management's feedback, the directors will take a decision of what processes / procedures to amend or introduce. A timeline for implementation will also be discussed and decided upon. Feedback on the implementation of any changes is to be reported back to the directors, since they are ultimately responsible for the company's operations.

The MLRO will obviously be involved and his input will be deemed paramount in respect of this process. He will be tasked to monitor aspects of the company's CDD and anti-money laundering policies and procedures. Any deficiency in these procedures or the compliance thereto, which requires urgent rectification will be dealt with immediately by the MLRO, who will report such incidents to the Board of Directors as appropriate. He will also request the Board to provide him with any needed support.

The MLRO will audit the procedure directly, at least annually. The MLRO will also report his findings to the Board of Directors. This report will include:

- ✓ a summary of any changes in the regulatory environment(s) in which Universal Soft SAC operates.
- ✓ a summary of AML activities within the company, including the number of internal suspicion reports received by the MLRO and the number of disclosures made to the Authorities.
- ✓ details of any compliance deficiencies on which action has already been taken, together with reports of the outcomes.
- ✓ details of any compliance deficiencies on which action needs to be taken, together with recommended actions including suggested timeframe and management support required.
- ✓ an outline of plans for the continuous development of involved staff, including periodic training and awareness raising activities for all relevant staff.

Where provide their feedback and timeline of when necessary action will be taken. management action is indicated, the Board of Directors will request management to.

This procedure will be reviewed and updated at least every six months. However, this may take place more frequently, if changes in legislation or guidelines are introduced at any point in time, or if deemed necessary.



UNIVERSAL SOFT SAC (VERSIÓN EN ESPAÑOL)

MANUAL DE PREVENCIÓN DEL LAVADO DE ACTIVOS

INTRODUCCION

El Lavado de activos y Financiamiento del terrorismo (LA/FT) representa una amenaza

significativa para la estabilidad económica, social y política de un país y de los mercados a nivel mundial. De ahí se deriva la atención que los gobiernos y los organismos de control prestan actualmente a este fenómeno, recomendando o exigiendo a las empresas tanto del sector financiero, como el de otros sectores, la implementación de un sistema de administración de riesgos para su prevención y administración.

UNIVERSAL SOFT SAC consciente de la importancia de la prevención del LA/FT y no desarrollando ningún tipo de actividad señalada en la Ley que obligue a implementar una política determinada relacionada a la prevención del lavado de activos y financiación del terrorismo, por lo cual no es una empresa controlada por la Unidad de Inteligencia Financiera – Perú en temas de prevención del lavado de activos y de financiación del terrorismo, sin embargo, adopta las mejores prácticas para la prevención de esta materia.

En este sentido y a través del presente Manual, UNIVERSAL SOFT SAC busca poner en práctica las metodologías y procedimientos, dando cumplimiento al diseño e implementación del sistema de prevención y control del lavado de activos y de financiación del terrorismo, de acuerdo a las buenas prácticas de UNIVERSAL SOFT SAC generando dentro de la organización una cultura orientada al cumplimiento de las normas establecidas en esta materia.

Por lo anterior, este Manual asigna responsabilidades y establecen los deberes que deben cumplir los Accionistas, Colaboradores, Directores, Gerentes, Apoderados y Representantes Legales de UNIVERSAL SOFT SAC mediante la adopción de procedimientos específicos de obligatorio cumplimiento.

1. OBJETIVO.

Proporcionar un Manual para el Sistema de Administración del riesgo de lavado de activos

Financiamiento del terrorismo en UNIVERSAL SOFT SAC en procura de prevenir e implementar Controles ante cualquier transacción que realice con algún tercero, que pueda deteriorar la imagen de la entidad. Además, evidenciar el compromiso asumido por UNIVERSAL SOFT SAC en la lucha contra el LA/FT.

2. ALCANCE.

El alcance del manual comprende a los Accionistas, Directores, Gerentes, Representantes y en general a todo el personal de UNIVERSAL SOFT SAC.

3. REFERENCIAS LEGALES Y OTRAS NORMAS

(i) Decreto Ley N.º 25475 y sus normas modificatorias, Ley que establece la penalidad para los delitos de terrorismo y los procedimientos para la investigación, la instrucción y el juicio. (ii) Ley N.º 27693 y sus normas modificatorias, Ley que crea la Unidad de Inteligencia Financiera del Perú.

(iii) Ley N.º 27765 y sus normas modificatorias, Ley Penal contra el Lavado de Activos.

(iv) Decreto Supremo N.º 018-2006-JUS, Reglamento de la Ley N.º 27693.

(v) Resolución SBS N.º 1782-2007 y sus normas modificatorias, Reglamento de Infracciones y Sanciones en materia de prevención del lavado de activos y

financiamiento del terrorismo, aplicable a los sujetos obligados que no cuentan con organismo supervisor.

(vi) Otras normas sobre la materia.

4. POLITICAS.

Constituye política de prevención general de UNIVERSAL SOFT SAC las siguientes: (i) Cumplir y respetar las leyes y normas aplicables al Manual de Prevención de Lavado de Activos y Financiamiento del Terrorismo y el Código de Ética.

(ii) Colaborar en la lucha contra el lavado de activos y el financiamiento del terrorismo, proponiendo al adecuado funcionamiento del Sistema de prevención del LA/FT.

(iii) Conocer a sus trabajadores y a sus clientes, sean estos habituales o no habituales.

(iv) Sanciones:

UNIVERSAL SOFT SAC aplicara medidas correctivas conducentes para sancionar a los funcionarios que directa o indirectamente faciliten la utilización de UNIVERSAL SOFT SAC como instrumento para la realización de operaciones ilícitas, sin perjuicio de la responsabilidad penal, civil o administrativa a la que se encuentren sujetos. Las mismas que se detallarán más adelante.

(v) Rechazar cualquier tipo de operación ilícita.

UNIVERSAL SOFT SAC rechazará conforme a los procedimientos consagrados en este Manual cualquier operación o servicio requerido por terceros, que considere proviene de actividades ilícitas.

(vi) Implementar y divulgar el Manual:

UNIVERSAL SOFT SAC deberá a través del oficial de cumplimiento y/o quien hiciera sus veces deberá difundir y poner en conocimiento el cumplimiento del contenido del Manual. Los registros y análisis que se practiquen a las operaciones de los Clientes, así como de los informes que requieran las autoridades competentes, cuando esta proceda.

(vii) UNIVERSAL SOFT SAC deposita la confianza en sus funcionarios, por lo tanto, éstos deben desarrollar sus actividades con honestidad, integridad, transparencia, lealtad y competencia

5. MECANISMOS DE PREVENCIÓN CON RELACIÓN AL CLIENTE, PROVEEDORES

Y LOS COLABORADORES.

5.1 CLIENTES

UNIVERSAL SOFT SAC establecerá los mecanismos internos para que los colaboradores

identifiquen a los clientes, siempre a través del registro individual en la plataforma online a través de: tratándose de nacionales, los identificarán con la presentación de su documento nacional de identidad (DNI); tratándose de extranjeros no residentes, con su pasaporte y; tratándose de extranjeros residentes, con su carné de extranjería.

Si el cliente es una persona jurídica se identificará a la persona natural que la representa, en cuyo caso se le requerirá el documento de identidad que corresponda de acuerdo al párrafo anterior, además de recabar la información respecto de la denominación o razón social de la persona jurídica, su número de RUC y domicilio legal, verificándose con los documentos probatorios respectivos para cada caso.

Reactualizar los datos de los clientes, sobre su identidad, domicilio(s), teléfonos, correo electrónico, administrador, gerente o representante de ser el caso.

Los colaboradores, informarán al Oficial de Cumplimiento de las operaciones inusuales que podría tener algún cliente, cuando realice o pretenda realizar, teniendo en cuenta las señales de alertas establecidas en el presente Manual.

5.2 PROVEEDORES

UNIVERSAL SOFT SAC establecerá los mecanismos internos para que los colaboradores identifiquen a los proveedores, a través de: tratándose de nacionales, los identificarán con la presentación de su documento nacional de identidad; tratándose de extranjeros no residentes, los identificarán con su pasaporte y; tratándose de extranjeros residentes, con su carné de extranjería.

Si el proveedor es una persona jurídica se identificará a la persona natural que la representa, en cuyo caso se le requerirá el documento de identidad que corresponda de acuerdo al párrafo anterior, además de recabar la información respecto de la denominación o razón social de la persona jurídica, su número de RUC y domicilio legal, verificándose con los documentos probatorios respectivos para cada caso.

Reactualizar los datos de los proveedores, sobre su identidad, domicilio(s), teléfonos, correo electrónico, administrador, gerente o representante de ser el caso.

Los colaboradores informarán al Oficial de Cumplimiento de las operaciones inusuales que algún proveedor realice o pretenda realizar, teniendo en cuenta las señales de alerta establecidas en el presente Manual, incluyendo aquellas identificadas por UNIVERSAL SOFT SAC

5.3 COLABORADORES

UNIVERSAL SOFT SAC llevará un legajo o archivo físico/digital personal de cada colaborador con la información que cada uno proporcione bajo juramento, sobre sus antecedentes personales, laborales (hoja de vida – curriculum vitae) y patrimoniales, para lo cual se utilizará formatos definidos por la compañía, estará en custodia de Recursos Humanos.

Es obligación de cada colaborador comunicar a su jefe inmediato y/o Capital Humano, algún cambio al respecto, en forma escrita, en un plazo máximo que no excederá de los treinta (30) días calendario de ocurrido el cambio. Dicho cambio se hará de conocimiento al Oficial de Cumplimiento para la actualización respectiva del legajo personal del colaborador, el cual estará en custodia de capital Humano.

UNIVERSAL SOFT SAC capacitará a través de charlas (presenciales/virtuales) en temas relativos a la Lucha contra el lavado de activos y el financiamiento del terrorismo), para sus colaboradores, en especial aquellos que tienen trato directo con clientes y proveedores, permitiendo a UNIVERSAL SOFT SAC y a todos sus colaboradores, tener un mayor conocimiento en materia de prevención del lavado de activos y del financiamiento del terrorismo.

6. REPORTES

Con estos reportes se busca garantizar el funcionamiento de procedimientos de control de riesgos incluidos en el presente Manual, así como el cumplimiento de las buenas prácticas en prevención del Lavado de Activos y prevención del Terrorismo y colaborar con las autoridades a cargo de la lucha contra las actividades delictivas.

6.1 REPORTES INTERNOS.

Reporte interno de operaciones inusuales o sospechosas

Siempre que un colaborador de UNIVERSAL SOFT SAC en desarrollo de sus funciones detecte una operación inusual y/o sospechosa, deberá reportar este hecho en forma a su superior jerárquico quien de inmediato deberá poner en conocimiento de este hecho al Oficial de Cumplimiento para que se dé inicio al análisis respectivo.

El escrito mediante el cual se reporte una transacción inusual, deberá contener:

- Fecha del reporte.
- Colaborador que lo realiza.
- Nombre y número de identificación de la contraparte relacionado. - Descripción clara de la operación es inusual y/o sospechosa - Observaciones adicionales.

6.2 CONSERVACIÓN DE DOCUMENTOS RELACIONADOS CON EL SISTEMA INTEGRAL

PARA LA PREVENCIÓN Y CONTROL DEL LAVADO DE ACTIVOS Y FINANCIACIÓN DEL

TERRORISMO.

Todos los registros y documentos que se generen en desarrollo de las políticas y procedimientos contenidos en el presente Manual, deberán cumplir con los criterios de integridad, confiabilidad, disponibilidad, cumplimiento, efectividad, eficiencia y confidencialidad de la información allí contenida y deberán mantenerse de conformidad con las normas que rigen la conservación documentaria de la empresa.

El Oficial de Cumplimiento conserva la documentación de manera física/digital que soporta la información asociada en materia de prevención del LA/FT, en una carpeta física o digital definida para tal fin, esta carpeta se encuentra a disposición de los diferentes entes de control cuando sea requerido y cuando aplique.

6.3 ATENCIÓN DE SOLICITUDES DE INFORMACIÓN

UNIVERSAL SOFT SAC proporcionará la información requerida, para las investigaciones o procesos que se estén llevando a cabo con relación al lavado de activos o financiamiento del terrorismo, cuando le sean comunicadas y/o apliquen.

7. DETECCIÓN DE OPERACIONES INUSUALES O SOSPECHOSAS

La detección de operaciones inusuales o sospechosas para los diferentes grupos de interés, se realizará de la siguiente manera:

Cada dueño del proceso será responsable de analizar su proceso y cualquier incumplimiento pueda tener relación directa o indirecta con el lavado de activos o la financiación del terrorismo debe ser reportado de manera inmediata al oficial de cumplimiento, quien determinará si esta inusualidad puede o no catalogarse como sospechosa.

8. INTEGRACIÓN DEL SISTEMA DE PREVENCIÓN DE LA/FT, CON EL CÓDIGO DE ÉTICA. El Sistema implementado para prevenir y controlar el riesgo de Lavado de Activos y Financiación del Terrorismo por UNIVERSAL SOFT SAC se encuentra en consonancia con los valores corporativos contenidos en el Código de Ética de UNIVERSAL SOFT SAC

9. COLABORADORES DEL SISTEMA DE PREVENCIÓN DEL LA/FT.

9.1 ALTA DIRECCION

- La Alta Dirección tendrá las siguientes facultades en materia de LA/FT:
- Señalar las políticas para la prevención y control de lavado de activos y de la financiación del terrorismo.
- Aprobar el Manual de prevención de LA/FT así como sus actualizaciones.
- Aprobar los mecanismos e instrumentos que crea conveniente utilizar para la prevención de LA/FT de la Empresa.
- Designar al Oficial de Cumplimiento.
- Disponer los recursos necesarios para mantener el sistema de prevención de LA/FT, descrito en el presente manual.

9.2 OFICIAL DE CUMPLIMIENTO

Para UNIVERSAL SOFT SAC el Oficial de Cumplimiento, será designado por la Alta dirección y por no ser de acción obligatoria, realizar roles, cuando aparezca alguna acción y/o solicitud en referencia al Lavado de activos y financiamiento del terrorismo, además tomara el tiempo necesario para el desarrollo de sus roles cuando le sea requerido y recibir el apoyo que le permita cumplir en forma adecuada las mismas.

El oficial de cumplimiento tendrá los siguientes roles:

- Velar por el efectivo y oportuno funcionamiento de los controles para la prevención de Lavado de Activos y Financiamiento del Terrorismo.
- Presentar informes a la Alta Dirección, cuando le sea requerido, en los cuales debe referirse como mínimo a los siguientes aspectos:

La efectividad de los mecanismos e instrumentos establecidos, así como de las medidas adoptadas para corregir las fallas en el sistema de autocontrol para prevenir el LA/FT.

Promover la adopción de correctivos al sistema LA/FT.

Atender y coordinar cualquier requerimiento, solicitud o diligencia de autoridad competente judicial o administrativa en esta materia.

Coordinar planes de capacitación sobre el Sistema de Prevención de LA/FT dirigido a todos los colaboradores de la Empresa.

La designación de un Oficial de Cumplimiento no exime a la Empresa, ni a los demás

colaboradores de la obligación de detectar y reportar internamente las operaciones inusuales y determinar las operaciones sospechosas y reportarlas oportunamente.

9.3 COLABORADORES

Todos los colaboradores de UNIVERSAL SOFT SAC, deberán seguir las políticas internas que hacen referencia al lavado de activos y la financiación del terrorismo.

Todos los colaboradores deben anteponer el cumplimiento de las normas éticas y en materia de Prevención de Riesgo de Lavado de Activos y Financiación del Terrorismo al logro de los objetivos estratégicos.

Dar cumplimiento a las normas en materia de prevención del lavado de activos y financiación del terrorismo al logro de los objetivos de la Empresa.

9.4 COMITÉ ASESOR PARA TEMAS DE LAVADO DE LA/FT

La Empresa cuenta con el Comité de Ética de UNIVERSAL SOFT SAC cuyo objetivo principal es

Contribuir con el fortalecimiento de la conducta ética en la Empresa, el mismo que cumplirá sus funciones para temas de prevención de Lavado de Activos y Financiamiento del terrorismo

Cuando los temas a tratar sean exclusivamente de LA/FT, serán invitados:

Los Directores y/o Gerentes de las áreas involucradas en el proceso y demás colaboradores y/o terceros que se considere pertinentes.

En el ejercicio de la labor de control y supervisión del Sistema de Prevención del LA/FT, el Comité, utilizará no sólo sus propios mecanismos de supervisión, sino que, adicionalmente se apoyará en el Oficial de Cumplimiento de UNIVERSAL SOFT SAC y, de ser el caso, en los auditores internos.

Responsabilidades del Comité de Ética en materia de prevención del LA/FT

- Reunirse cada vez que sea convocado, con el objeto de analizar y revisar cualquier tipo de información relacionada con el tema de LA/FT cuando se considere que la Empresa pueda incurrir en algún tipo de riesgo.
- Estudiar, cuando se requiera, los reportes de operaciones sospechosas o inusuales de cualquier área de UNIVERSAL SOFT SAC y/o tercero llegue a detectar.

- Documentar debidamente los análisis y conclusiones derivadas de cada reunión del comité, para temas de LA/FT. Para tal efecto cada reunión deberá quedar debidamente documentada en un acta que deberá ser firmada por los asistentes.

Las copias de cada acta serán enviadas al Gerente General de la Empresa.

- Resolver cualquier conflicto de interés que sobre el tema de Lavado de Activos y Financiación del terrorismo pueda llegar a surgir en la Empresa.

10. SEÑALES DE ALERTA

- Las Señales de Alerta constituyen para los sujetos obligados, sus colaboradores y Oficial de Cumplimiento, una herramienta de apoyo para la detección y/o prevención de operaciones sospechosas relacionadas al lavado de activos y financiamiento del terrorismo.
- En caso se identifique alguna de las operaciones o situaciones aquí descritas, corresponderá al Oficial de Cumplimiento su análisis y evaluación, con la finalidad de determinar si constituyen operaciones sospechosas y en este último caso, comunicarlas al Comité y/o Alta Dirección.

A continuación, se identifican de manera no limitativa, señales de alerta sobre operaciones o conductas inusuales relativas a los proveedores, clientes y colaboradores de UNIVERSAL SOFT SAC:

10.1 ACCIONISTAS

- a) Realizan operaciones que no coinciden con su capacidad económica de acuerdo con la información que reposa en UNIVERSAL SOFT SAC
- b) Suministran información falsa, de difícil verificación o insuficiente.
- c) Operaciones simultáneas en diferentes cuentas y en las mismas oficinas relacionadas con la compra y venta de títulos de UNIVERSAL SOFT SAC
- d) Se niegan a revelar información sobre su objeto social o demás datos relacionados en el formulario de conocimiento del accionista.
- e) Presentan un crecimiento desproporcionado en las operaciones del accionista.

- f) Presentan cambios frecuentes en la actividad económica, dirección, teléfono u objeto social del accionista.
- g) Desarrollan actividades diferentes a las del objeto social para el cual fue creada la Empresa.
- i) Registran el mismo número de cédula o NIT de otro accionista de UNIVERSAL SOFT SAC
- j) Registran la misma dirección y/o teléfono de otros accionistas con los que no tienen relación aparente.
- k) Presentan el teléfono desconectado o el número telefónico al momento de efectuar la llamada de verificación, no concuerda con la información inicialmente suministrada.
- l) Diligencian los formularios o formatos con letras ilegible o amañada.
- m) Son renuentes a la actualización de información.

10.2 CLIENTES DE UNIVERSAL SOFT SAC

- a) El cliente se niega a proporcionar la información requerida para el registro interno ésta presente identificaciones inconsistentes, inusuales o de dudosa procedencia.
- b) Que se tome conocimiento por los medios de difusión pública u otro, según sea el caso, que un cliente está siendo investigado o procesado por el delito de lavado de activos, delitos precedentes, el delito de financiamiento del terrorismo y sus delitos conexos.
- c) El cliente presenta una inusual despreocupación respecto de los riesgos que asume o los costos que implican el negocio o la transacción que está realizando.
- d) El cliente realiza de forma reiterada operaciones fraccionadas.
- e) El cliente realiza operaciones complejas sin una finalidad aparente.
- f) El cliente realiza constantemente operaciones y de manera inusual utiliza o pretende utilizar dinero en efectivo como único medio de pago.
- g) El cliente insiste en encontrarse con el personal de UNIVERSAL SOFT SAC en un lugar distinto a la oficina, agencia o local, para realizar una actividad comercial o financiera.

10.3 PROVEEDORES DE UNIVERSAL SOFT SAC

- a) El proveedor se niegue a proporcionar la información requerida para el registro interno o ésta presente identificaciones inconsistentes, inusuales o de dudosa procedencia.
- b) Que se tome conocimiento por los medios de difusión pública u otro, según sea el caso, que un proveedor está siendo investigado o procesado por el delito de lavado de activos, delitos precedentes, el delito de financiamiento del terrorismo y sus delitos conexos.
- c) El proveedor presenta una inusual despreocupación respecto de los riesgos que asume o los costos que implican el negocio o la transacción que está realizando.
- d) El proveedor realiza operaciones complejas sin una finalidad aparente.
- e) El proveedor insiste en encontrarse con el personal de UNIVERSAL SOFT SAC en un lugar distinto a la oficina, para realizar una actividad comercial o financiera.

10.4 COLABORADORES DE UNIVERSAL SOFT SAC

- a) El estilo de vida del colaborador no corresponde a sus ingresos o existe un cambio notable e inesperado en su situación económica o en sus signos exteriores de riqueza sin justificación aparente.
- b) El colaborador utiliza su domicilio personal o el de un tercero, para recibir documentación de los clientes de UNIVERSAL SOFT SAC
- c) Cualquier negocio realizado por el colaborador donde la identidad del beneficiario sea desconocida, contrariamente al procedimiento normal para el tipo de operación o transacción de que se trate.
- d) El colaborador tiene o insiste en tener reuniones con clientes UNIVERSAL SOFT SAC en un lugar distinto a la oficina, u otro local o fuera del horario laboral, sin justificación alguna, para realizar una operación comercial o financiera.
- e) El colaborador está involucrado con organizaciones sin fines de lucro, tales como fundaciones, asociaciones, comités, ONG, entre otras, cuyos objetivos han quedado debidamente demostrados que se encuentran relacionados con la ideología, reclamos, demandas o financiamiento de una organización terrorista nacional y/o extranjera, siempre que ello sea debidamente demostrado.
- f) Se comprueba que el colaborador no ha comunicado o ha ocultado al Oficial de

Cumplimiento, información relativa al cambio en el comportamiento de algún cliente.

10.5 OTROS

A continuación, se identifican de manera no limitativa, señales de alerta relacionadas a la actividad de UNIVERSAL SOFT SAC

- a) Compras sucesivas de bienes muebles y transferencia de los mismos a diferentes personas, mediante adenda o cláusulas adicionales al contrato.
- b) Compras masivas de bienes muebles y/o inmuebles, pese a que el saneamiento físico legal está pendiente.
- c) El cliente realiza frecuentemente operaciones por importes de dinero que no guardan relación con la ocupación que declara tener.
- d) El representante o intermediario realiza operaciones sustanciales en efectivo, a nombre de clientes o fideicomisos, cuyo perfil no concuerda con tales operaciones.
- e) El representante o intermediario realiza operaciones en efectivo, a nombre de clientes o fideicomisos, intentando ocultar la identidad del verdadero cliente.
- f) Compraventa de bienes inmuebles cuya titularidad final es desconocida o poco transparente.
- g) Contratación de personal no residente en el país, así como personal extranjero que no se encuentre debidamente documentada su residencia en el país.
- h) Contratación de servicios y/o compras de bienes muebles con proveedores que muestren diferencias significativas a nivel de costos en las cotizaciones con respecto al mercado.
- i) Adjudicación de contratos continuos con proveedores de baja calificación o recientemente constituidos que no demuestren cierto nivel de solidez.
- j) Centralizar la participación y selección de los mismos proveedores en distintos concursos y ofertas propuestas por la compañía.
- k) Se gestione la conformidad a compras con cantidades o especificaciones diferentes a las solicitadas por el usuario final.
- l) Pago de total a proveedores cuya entrega del bien y servicio no se encuentra concluido según los términos de referencia.
- m) Compraventa de un inmueble a bajo precio cuando su valor real es alto, o viceversa.

- n) Solicitud de realizar operaciones en condiciones o valores que no guardan relación con actividades o el perfil del adquirente.
- o) Solicitud de dividir operaciones o dividir los pagos de las mismas, generalmente en efectivo.
- p) Habilitaciones Urbanas o Edificaciones con aportes de persona(s) jurídica(s) recientemente constituida y se convierte en inactiva o no habida, tan pronto concluye la obra.
- q) Adquisiciones en las que participan empresas offshore.
- r) Aceptación de regalos u obsequios proveniente de proveedores con la intención de favorecer en la adjudicación de contratos.

11. SANCIONES

El no cumplimiento de los lineamientos contenidos en el presente Manual o en los instrumentos normativos sobre la materia (Código de Ética, lavado de activos y Financiamiento del terrorismo) será considerado como falta laboral, cuando aplique, la misma que será sancionada de acuerdo a lo establecido en el Reglamento Interno de Trabajo de UNIVERSAL SOFT SAC

Dichas medidas serán aplicadas teniendo en consideración los criterios de razonabilidad y proporcionalidad de la sanción respecto a la falta incurrida y sin perjuicio de la responsabilidad penal o civil que la falta pudiera acarrear. La documentación que sustenta las medidas adoptadas deberá ser archivada en el legajo personal del colaborador.

12. REVISIÓN DEL SISTEMA DE PREVENCIÓN

El presente manual se revisará anualmente por parte del oficial de cumplimiento con el Gerente General y/o Representante del Comité de ética, para su mantenimiento, adecuación a los cambios y/o cuando se requiera.

Este manual se revisó en fecha 02 de diciembre de 2022