

LIST OF INDICATORS FOR RECOGNITION OF PERSONS AND TRANSACTIONS FOR WHICH THERE ARE GROUNDS OF SUSPICION OF MONEY LAUNDERING OR FINANCING OF TERRORISM AT ORGANIZERS OF THE GAMES OF CHANCE THROUGH MEANS OF ELECTRONIC COMMUNICATION

1. Customer accesses from an IP address (Internet Protocol address) from a country and/or region that is on the list of countries that have strategic deficiencies in the system for combating money laundering and financing of terrorism.
2. Customer is a citizen of a country that does not comply with the standards for preventing money laundering and financing of terrorism.
3. Obligated entity has knowledge that the customer is trying to hide the IP address.
4. Obligated entity has knowledge that the customer was punished for some criminal acts.
5. Customer is a politically exposed person, i.e. an official of another state, an official of an international organization or an official of the Republic of Serbia.
6. Customer owns cards that were issued in offshore destinations or countries that are on the list of countries that have strategic deficiencies in the system for combating money laundering and financing of terrorism.
7. Customer requests that the realized profit be transferred to another account, or to the account of a third party.
8. In the event of a big winning, the customer avoids to confirm the identity.
9. Customer is interested in certain packages of games and suggests, that is, makes proposals for certain packages.
10. Customer submits, or has submitted, a request for the registration of several registration orders with the same data.
11. Customer has multiple accounts, or "on-line wallets" in which the amounts of incoming payments and/or outgoing payments do not individually exceed the amounts subject to reporting under the Law on the Prevention of Money Laundering.
12. Customer has more than three bank accounts and uses them alternately when participating in the games of chance.
13. Bank accounts/payment cards details do not match registered customer details (identity fraud/ identity theft).
14. Customer uses prepaid cards to participate in the games of chance.
15. Customer deposits cash to top up his registered account, in order to participate in the games of chance through means of electronic communication.
16. Customer deposits a relatively large amount of money into his account and after a certain period withdraws it, without any activities, or after very little participation in the games of chance.
17. Customer regularly invests large sums of money in the games of chance, with the lowest acceptable level of loss.
18. Customer invests little, but often, in the games of chance, but his annual total spending is large and far exceeds his annual income.
19. Different customers are connected to the same bank accounts, which they use, withdraw funds, or deposit their winnings in the games of chance (current account authorizations).
20. Customer can be connected to previously recorded registration orders.

21. Customers linked by the media to terrorism/terrorist financing/terrorist organizations or terrorist activities.
22. Suspicion that the person is marked on "black lists" or that the person is on the international list of marked persons or that the person is related to the persons that are on the said lists.
23. There is a previously issued order for the customer by the Administration for the Prevention of Money Laundering for the monitoring of transactions carried out with obliged entities.
24. Customers break up large amounts of deposits into smaller transactions.
25. Transactions for which the obliged entity's employees, on the basis of their experience, knowledge and information, estimated that they were not in accordance with the usual activities of the customer.
26. Customer knows very well the rules on reporting suspicious transactions.
27. Information provided by the customer contains numerous inconsistencies (for example, the e-mail domain or telephone number does not match the country).
28. In case of cash transactions, the customer brings in large sums of uncounted money, and after counting, reduces the transaction to an amount that is slightly below the limit for which there is a legal obligation to report.
29. When making cash transactions to top up his registered account for the purpose of participating in the games of chance through means of electronic communication, the customer brings in large sums of uncounted money in worn and damaged banknotes.

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(*round seal*)