# APPENDIX C: BUSINESS ASSOCIATE (‘BA’)

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**Overview of Due Diligence Conducted for [insert BA name here]**

**[insert date here]**

The due diligence performed on BAs by [Licensee] may vary from company to company but overall the following areas are covered in the Company’s due diligence checks: The differences may vary depending on if the company is publicly traded, privately held, a government controlled agency or currently licensed in a highly regulated gaming jurisdiction. If the BA is an Alderney licensee, there is no requirement to include due diligence information in the ICS.

The due diligence summary for BA is split into two sections 1) Overview of Company history and financial results [if not an Alderney licensee] and 2) Overview of [BA]’s Registration and Verification Process.

* + - * 1. Overview of [BA]

* **General Company Information**
* **Jurisdiction of Incorporation**
* **Income Statement and Balance sheet**
* **Corporate Structure**
* **Share ownership**
* **Officers and Directors of the Company + Biographies**
* **Subsidiaries and Affiliates**
* **Business Locations**
* **Web sites**
* **Gaming Licenses**
* **Areas of Concern**
  + - * 1. Overview of [BA]’s Customer Account Management Process

[Licensee]’s games will be offered through [BA] using the following URLs -

* [insert list of URLs and other access channels here]

The following sections outline [BA]’s control process as they pertain to certain sections of [Licensee]’s Internal Control System [this template only contains a sampling of the sections and the suggested format for the data]:

|  |  |  |
| --- | --- | --- |
| **Section From [Licensee] ICS** | **Process Conducted by [**BA**]** | **Process Conducted by [Licensee]** |
| **Section 1.8 – Money Laundering and Terrorist Financing** | *State which jurisdiction’s AML regime BA adheres to, and confirm that Licensee’s due diligence review has established BA’s AML controls as compliant with Alderney requirements in Schedule 16 of the eGambling regulations, 2009* | *Add reference to Licensee’s AML controls in the ICS* |
|  |  |  |
| **3.1.2 – Terms and Conditions** | *Confirm that Licensee’s due diligence review has established fair BA Terms & Conditions, and add reference to where they can be found* | *If applicable, confirm that BA Terms & Conditions are complemented by Licensee Terms & Conditions and add reference to Licensee T&Cs in the ICS* |
|  |  |  |
| **Section 3.2.1 - Customer Due Diligence** | *Describe the BA processes for verification of new players and ongoing due diligence* | *If applicable, describe the Licensee’s additional controls for customer due diligence* |
|  |  |  |
| **Section 3.5 - Customers at Risk / Responsible Gambling** | *Describe the BA’s controls for detecting and preventing problem gambling* | *Describe the Licensee’s additional controls for detecting and preventing problem gambling* |
|  |  |  |