

**OFFICIAL DIARY OF THE UNION**

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Body: Ministry of Finance/Secretariat of Prizes and Bets

**SPA/MF ORDINANCE No. 1,143, OF JULY 11,  
2024**

Provides for policies, procedures and internal controls to prevent money laundering, as covered by Law No. 9,613, of March 3, 1998, on the financing of terrorism and the proliferation of weapons of mass destruction (PLD/FTP) and other related offenses to be adopted by betting operators operating fixed-odd bets, as covered by Laws No. 13,756, of December 12, 2018, and No. 14,790, of December 29

2023.

**THE SECRETARY OF PRIZES AND BETS OF THE  
MINISTRY OF FINANCE**, in the use of the powers conferred on him by art. 55, item I, of Annex I of Decree No. 11,907, of January 30, 2024, and in view of the provisions of Law No. 13,756, of December 12, 2018, in Law No. 14,790, of December 29, 2023 and in Law No. 9,613, of March 3, 1998, resolves:

**CHAPTER I**

**OBJECT AND SCOPE OF APPLICATION**

**OFFICIAL GAZETTE OF THE UNION**

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Agency: Ministry of Finance/Secretariat of Prizes and bets

**ORDINANCE SPA/MF No. 1,143, OF JULY 11, 2024**

Provides for policies, procedures, and internal controls for the prevention of money laundering, as provided by Law nº 9,613, of March 3, 1998, financing of terrorism, and the proliferation of weapons of mass destruction (AML/CTF) and other related offenses to be adopted by betting operators who exploit fixed-odds betting, as provided for by Laws nº 13,756, of December 12, 2018, and nº 14,790, of December 29, 2023.

**THE SECRETARY OF PRIZES AND BETS OF THE  
MINISTRY OF FINANCE**, in the exercise of the powers conferred by art. 55, item I, of Annex I of Decree nº 11,907, of January 30, 2024, and considering the provisions of Law nº 13,756, of December 12, 2018, Law nº 14,790, of December 29, 2023, and Law nº 9,613, of March 3, 1998, resolves:

**CHAPTER I**

**OBJECT AND SCOPE OF APPLICATION**



**Art. 1** This Ordinance provides for policies, procedures and internal controls to prevent money laundering, terrorist financing and the proliferation of weapons of mass destruction (PLD/FTP) and other related crimes to be adopted by operating agents who exploit fixed odds bets as provided for in the Laws

No. 13,756, of December 12, 2018, and No. 14,790, of December 29, 2023, in compliance with the duties assigned to them by arts. 10 and 11 of Law No. 9,613, of March 3, 1998, by Law No. 13,810, of March 8, 2019, and related legislation.

**Art. 2** This Ordinance is applicable to betting operating agents in relation to PLD/FTP duties and prevention of other related crimes that are legally attributed to them, including under the responsibility of their administrators, in accordance with art. 12 of Law No. 9,613, of 1998.

**Art. 3** For the purposes of this Ordinance, the following are considered:

I - betting operator agent: legal entity with authorization from the Prizes and Betting Secretariat of the Ministry of Finance to exploit fixed odds betting;

II - bettor: natural person who places a bet;

III - bet: act through which a certain amount is placed at risk in the expectation of obtaining a prize;

**Art. 1** This Ordinance provides for policies, procedures, and internal controls for the prevention of money laundering, financing of terrorism, and the proliferation of weapons of mass destruction (AML/CTF) and other related offenses to be adopted by betting operators who exploit fixed-odds betting as provided for by Laws n° 13,756, of December 12, 2018, and n° 14,790, of December 29, 2023, in

compliance with the duties assigned to them by arts. 10 and 11 of Law n° 9,613, of March 3, 1998, by Law n° 13,810, of March 8, 2019, and related legislation.

**Art. 2** This Ordinance applies to betting operators in relation to the AML/CTF duties and prevention of other related offenses that are legally assigned to them, including under the responsibility of their administrators, as provided for in art. 12 of Law n° 9,613, of 1998.

**Art. 3** For the purposes of this Ordinance, the following definitions apply:

I - betting operator: a legal entity authorized by the Secretariat of Prizes and Bets of the Ministry of Finance to exploit fixed-odds betting;

II - bettor: a natural person who places a bet;

III - bet: an act through which a certain amount is placed at risk in the expectation of obtaining a prize;





IV - betting exchange (bet exchange): category in which bettors bet against each other and the bet multiplier value (odd) is defined between them and not by the operating agent, who can charge a commission on the net profit of the bet

winner.

V - transactional account: prepaid deposit or payment account, owned by the operating agent, maintained in a financial or payment institution authorized to operate by the Bank

Central do Brasil, used as a destination for financial contributions made by bettors, to maintain the values related to open bets or, at the bettor's option, to maintain the prizes received;

VI - betting platform: electronic channel integrated into the betting system used to offer sports betting and online games to bettors; It is

VII - platform user: natural person registered on the betting platform, regardless of having placed a bet.

**Art. 4** Betting operating agents must request authorization to use the Financial Activities Control System (Siscoaf), as indicated on the Financial Activities Control Council (Coaf) page on the internet, maintaining

updated in the system, your data and those of corresponding users.

IV - bet exchange: a category in which bettors bet against each other, and the multiplier value of the bet (odd) is defined between them and not by the operator, who may charge a commission on the net profit of the winning bet;

V - transactional account: a deposit or prepaid payment account, owned by the betting operator, maintained at a financial or payment institution authorized to operate by the Central Bank of Brazil, used as the destination for financial contributions

made by bettors, to maintain the amounts related to open bets or, at the bettor's option, to maintain the received prizes;

VI - betting platform: an electronic channel integrated into the betting system used to offer sports bets and online games to bettors;

VII - platform user: a natural person registered on the betting platform, regardless of whether they have placed a bet.

**Art. 4** Betting operators must request authorization to use the Financial Activities Control System (Siscoaf), as indicated on the Financial Activities Control Council (Coaf) website, keeping their data and those of the corresponding users updated in the system.





## CHAPTER II

### POLICIES, PROCEDURES AND CONTROLS INTERNAL

#### Section I

##### General Provisions

**Art. 5** Betting operating agents must adopt and implement PLD/FTP policies, procedures and internal controls, subject to the provisions in Law No. 9,613, of 1998, in Law 13,260, of 16 March 2016 and Law No. 13,810 of 2019, as well as prevention of other related crimes, in accordance with applicable legislation.

**Art. 6** The PLD/FTP policies, procedures and internal controls must cover guidelines, specifications and mechanisms for checking their effective service by the betting operating agent.

**Art. 7** Internal PLD/FTP policies must include, at a minimum, the following guidelines:

I - definition of roles and responsibilities in relation to compliance with the obligations provided for in this Ordinance, without prejudice to the scope provided for in it regarding administrative liability for non-compliance with its provisions, in accordance with art. 12 of Law No. 9,613, of 1998;

## CHAPTER II

### POLICE, PROCEDURES, AND INTERNAL CONTROLS

#### Section I

##### General Provisions

**Art. 5** Betting operators must adopt and implement AML/CTF policies, procedures, and internal controls, in accordance with the provisions of Law n° 9,613, of 1998, Law n° 13,260, of March 16, 2016, and Law n° 13,810, of 2019, as well as the prevention of other related offenses, as provided for in the applicable legislation.

**Art. 6** The AML/CTF policies, procedures, and internal controls must include guidelines, specifications, and mechanisms to check their effective compliance by the betting operator.

**Art. 7** The internal AML/CTF policies must include, at a minimum, the following guidelines:

I - definition of roles and responsibilities regarding compliance with the obligations provided for in this Ordinance, without prejudice to the scope provided for regarding administrative liability for non-compliance with its provisions, as provided for in art. 12 of Law No. 9,613, of 1998;





II - identification, assessment, analysis and mitigation of the risks that new products, services or technologies may be used for money laundering, terrorist financing and proliferation of weapons of mass destruction

(LD/FTP) or other related offenses;

III - development, implementation and execution of a compliance program that encompasses the dissemination of an organizational culture to prevent ML/FTP and other related crimes, as well as integrity, good governance and the ESG (environmental, social and governance) agenda, including under the terms of Law No. 12,846, of August 1, 2013, for employees, partners and outsourced service providers; It is

IV - periodic and continuous carrying out of information and training activities in matters of prevention of ML/FTP and other related crimes, covering employees, partners and outsourced service providers.

**Art. 8** Internal AML/FT procedures must include, at a minimum, the following:

I - identification, qualification and risk classification of bettors and platform users;

II - identification, qualification and risk classification of employees, partners and outsourced service providers;

II - identification, evaluation, analysis, and mitigation of risks that new products, services, or technologies may be used for money laundering practices, financing of terrorism, and proliferation of weapons of mass destruction (ML/CTF) or other related offenses;

III - development, implementation, and execution of a compliance program that includes the dissemination of an organizational culture of prevention of ML/CTF and other related offenses, as well as integrity, good governance, and ESG (environmental, social, and governance) agenda, including under the terms of Law n° 12,846, of August 1, 2013, for employees, partners, and third-party service providers; and

IV - periodic and continuous information and training activities on ML/CTF prevention and other related offenses, covering employees, partners, and third-party service providers.

**Art. 8** The internal AML/CTF procedures must include, at a minimum, the following:

I - identification, qualification, and risk classification of bettors and platform users;

II - identification, qualification, and risk classification of employees, partners, and third-party service providers;





III - assessment and risk classification of its activities related to the operation of bets;

IV - risk assessment and classification in its business activities, contracting and product development, operations with financial and real estate assets; It is

V - risk assessment and classification when hiring employees, partners and service providers outsourced.

**Art. 9** Internal controls for PLD/FT must include, at a minimum, the following;

I - recording and maintenance of information relating to its operational, business and administrative activities;

II - maintaining an updated register of bettors and platform users;

III - maintaining an updated register of employees, partners and outsourced service providers;

IV - periodic verification and monitoring of compliance of payment institutions and financial institutions with which it maintains relationships, in relation to the Bank's authorization  
Central do Brasil for its operation;

III - risk assessment and classification of their activities related to the operation of bets;

IV - risk assessment and classification in their business activities, contracting, and development of products, operations with financial and real estate assets; and

V - risk assessment and classification in the hiring of employees, partners, and third-party service providers.

**Art. 9** Internal controls for Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF) must include at a minimum:

I - Record and maintain information related to their operational, business, and administrative activities;

II - Maintain an updated registry of bettors and platform users;

III - Maintain an updated registry of employees, partners, and third-party service providers;

IV - Periodically verify and monitor the compliance of payment institutions and financial institutions with which they have a relationship, regarding the authorization by the Central Bank of Brazil for their operation;





V - monitoring, selection and analysis of operations and activities, whether or not related to the operation of bets, for the purposes of communication to Coaf, in the cases set out in section II of art. 11 of Law No. 9,613, of 1998, as well as carrying out the communications provided for in art. 11 and in the sole paragraph of art. 12 of Law No. 13,810, of 2019; It is

VI - periodic verification of the effectiveness of the adopted policy and adherence to government regulations that include the identification and correction of verified deficiencies.

**Art. 10.** Betting operating agents must have, in national territory, the necessary resources to implement the procedures and controls defined in this Ordinance.

**Art. 11.** The betting operator must submit an annual report to the Prizes and Bets, until February 1st of the following year, with information on good practices adopted in the previous year, in order to comply with the provisions regarding policies, procedures and controls provided for in this Ordinance.

**Art. 12.** The policies referred to in art. 7th must be available on the betting operator's website, which must disclose them, as well as the related procedures and internal controls, among employees, partners and outsourced service providers, using clear and accessible language, at a level of detail compatible with the

V - Monitor, select, and analyze operations and activities, whether or not related to the operationalization of bets, for the purpose of reporting to the Financial Activities Control Council (Coaf), as per item II of art. 11 of Law nº 9,613, of 1998, as well as making the communications provided for in art. 11 and the sole paragraph of art. 12 of Law nº 13,810, of 2019; and

VI - Periodically verify the effectiveness of the adopted policy and adherence to government regulations that include the identification and correction of identified deficiencies.

**Art. 10** Betting operators must have, within the national territory, the necessary resources for the implementation of the procedures and controls defined in this Ordinance.

**Art. 11** Betting operators must submit an annual report to the Secretariat of Prizes and Bets by February 1st of the subsequent year, containing information about best practices adopted in the previous year, to comply with the provisions regarding the policies, procedures, and controls provided for in this Ordinance.

**Art. 12** The policies referred to in art. 7 must be available on the betting operator's website, and must be disseminated, along with the corresponding procedures and internal controls, among employees, partners, and third-party service providers, using clear and accessible language, at a level of detail





functions performed and the sensitivity of information.

**Art. 13.** The policies referred to in art. 7th must be documented, approved by the administrators of the betting operator and updated annually, as well as being compatible with the risk profiles:

I - the betting operator agent;

II – bettors;

III - the quantity and volume of resources involved in virtual and physical bets; It is

IV - employees, partners and outsourced service providers of the betting operating agent.

## Section II

### Risk Assessment Procedures

**Art. 14.** Betting operating agents must carry out an annual internal assessment with the aim of identifying and measuring risks of using their products and services in ML/FTP practices or other related crimes, including this assessment in the report provided for in art. 11.

§ 1 It is up to the betting operator to define the risk matrix used for its management.

compatible with the functions performed and the sensitivity of the information.

**Art. 13** The policies referred to in art. 7 must be documented, approved by the administrators of the betting operator, and updated annually, as well as being compatible with the risk profiles:

I - Of the betting operator;

II - Of the bettors;

III - Of the quantity and volume of resources involved in virtual and physical bets; and

IV - Of the employees, partners, and third-party service providers of the betting operator.

## Section II

### Risk Assessment Procedures

**Art. 14** Betting operators must conduct an internal annual assessment to identify and measure the risks of their products and services being used in practices of ML/CTF, or other related offenses, including this assessment in the report provided for in art. 11.

§ 1 The betting operator is responsible for defining the risk matrix used for its management.







§ 2 To identify risks, the internal assessment must consider, at a minimum, the risk profiles:

I - bettors and platform users;

II - from the betting operating agent itself, taking into account the specificity of its business model;

III - employees, collaborators, suppliers and outsourced partners; It is

IV - operations, products and services, taking into account distribution channels and use of technologies.

§ 3 The identified risks must be evaluated regarding its probability of occurrence and the magnitude of the financial, legal, reputational and socio-environmental impacts.

§ 4 Risk categories must be defined that result in the adoption of reinforced measures in relation to higher risk situations and enable the adoption of simplified measures for lower risk situations.

§ 5 Internal assessments of PLD/FTP and related crimes must document the measured risks, the measures adopted for their treatment and corresponding results.

**Section III**

§ 2 For risk identification, the internal assessment must consider, at a minimum, the risk profiles:

I - Of bettors and platform users;

II - Of the betting operator itself, considering the specificity of its business model;

III - Of employees, collaborators, suppliers, and third-party partners; and

IV - Of operations, products, and services, considering distribution channels and the use of technologies.

§ 3 The identified risks must be evaluated regarding their likelihood of occurrence and the magnitude of financial, legal, reputational, and socio-environmental impacts.

§ 4 Risk categories must be defined to enable enhanced measures for higher-risk situations and simplified measures for lower-risk situations.

§ 5 Internal AML/CTF and related offense assessments must document the measured risks, the measures adopted for their management, and the corresponding outcomes.

**Section III**





**The Procedures for Identification, Qualification and Risk Classification of Bettors and Platform Users.**

**Art. 15.** Betting operating agents must adopt identification procedures that allow the identity of bettors or platform users to be verified and validated at the time of registration, without prejudice to any need for authentication when placing bets or other operations within of the platform.

§ 1 The level of verification and validation of information from bettors or platform users must be defined by betting operating agents in accordance with the risk profile of the person to be identified.

§ 2 It is the responsibility of the betting operator to implement mechanisms that prevent the registration of those prevented from betting, in accordance with art. 26 of Law No. 14,790, of 2023.

**Art. 16.** Betting operating agents must adopt procedures that allow the qualification of bettors or platform users through the collection, verification and validation of information, compatible with their risk profile.

Single paragraph. Qualification procedures must cover measures aimed at:

**Procedures for Identifying, Qualifying, and Classifying Risk of Bettors and Platform Users**

**Art. 15** Betting operators must adopt identification procedures to verify and validate the identity of bettors or platform users at the time of registration, without prejudice to the need for authentication for placing bets or other operations within the platform.

§ 1 The level of verification and validation of bettors' or platform users' information must be defined by the betting operators according to the risk profile of the person to be identified.

§ 2 It is the responsibility of the betting operator to implement mechanisms to prevent the registration of individuals prohibited from betting, as per art. 26 of Law No. 14,790, of 2023.

**Art. 16** Betting operators must adopt procedures to qualify bettors or platform users by collecting, verifying, and validating information compatible with their risk profile.

Sole Paragraph. Qualification procedures must include measures aimed at:





I - assessment of the compatibility between the bettor's economic and financial capacity and the operations associated with it;

II - verification of the condition of the bettor or platform user as a politically exposed person (PEP), family member up to the second degree, representative or close collaborator of a person in this condition, in accordance with the rules published in this regard by Coaf; It is

III - obtaining information from the bettor or platform user necessary to compose the minimum set of registration data, as defined in the rules of the Prizes Secretariat and

Bets.

Single paragraph. The PEP condition lasts for five years from the date on which the person ceases to be in a position that qualifies him or her in this condition.

**Art. 17.** The information collected when qualifying bettors or users of the platform must be kept up to date, considering the evolution of the relationship with the qualified person and their risk profile.

**Art. 18.** Betting operating agents must classify bettors and platform users, based on the information obtained for their qualification, into the risk categories defined in the corresponding internal risk assessments.

I - Assessing the compatibility between the bettor's economic-financial capacity and the associated operations;

II - Verifying if the bettor or platform user is a politically exposed person (PEP), a second-degree relative, representative, or close associate of such a person, as per the regulation issued by Coaf; and

III - Obtaining information necessary for the minimum set of registration data, as defined by the Secretariat of Prizes and Bets' regulations.

§ The condition of being a PEP lasts for five years from the date the person ceases to hold a position that qualifies them as such.

**Art. 17** Information collected during the qualification of bettors or platform users must be kept updated, considering the evolution of the relationship with the qualified person and their risk profile.

**Art. 18** Betting operators must classify bettors and platform users based on the information obtained for their qualification, within the risk categories defined in the corresponding internal risk assessments.





**Art. 19.** The classification of bettors and platform users must be reviewed whenever there is a change in the risk profile of the classified person.

**Art. 20.** The identification, qualification and risk classification procedures for bettors and platform users must be formalized in a specific manual, approved by the administrators of the betting operator and updated

annually.

#### **Section IV**

##### **Identification, Qualification and Classification of Risk of Employees, Partners and Service Providers**

###### **Third party services**

**Art. 21.** Betting operating agents must implement procedures designed to get to know their employees, partners and third-party service providers, including identification and qualification procedures for risk assessment and mitigation.

Single paragraph. The procedures must be compatible with policies to prevent ML/FTP and other related crimes.

**Art. 22.** Registration data provided by employees, partners and third-party service providers must be validated, updated and stored by the betting operating agent.

**Art. 19** The classification of bettors and platform users must be reviewed whenever there is a change in the risk profile of the classified person.

**Art. 20** The procedures for identifying, qualifying, and classifying the risk of bettors and platform users must be formalized in a specific manual, approved by the betting operator's administrators, and updated annually.

#### **Section IV**

##### **Identification, Qualification, and Risk Classification of Employees, Partners, and Third Parties Party Service Providers**

**Art. 21** Betting operators must implement procedures to know their employees, partners, and third-party service providers, including identification and qualification procedures for risk assessment and mitigation.

Sole Paragraph. The procedures must be compatible with the ML/CTF prevention policies and other related offenses.

**Art. 22** The registration data provided by employees, partners, and third-party service providers must be validated, updated, and stored by the betting operator.





Single paragraph. The registration data of employees, partners and third-party service providers must be stored by the betting operating agent for at least 5 (five) years, from the end of the contract.

### **CHAPTER III**

#### **PROCEDURES RELATED TO THE SENDING COMMUNICATIONS TO COAF**

##### **Section I**

##### **Monitoring, Selection and Analysis**

**Art. 23.** Betting operating agents must implement procedures for monitoring, selecting and analyzing bets and operations associated with them with the aim of identifying those that may constitute evidence of ML/FTP practice or another related crime.

**Art. 24.** Monitoring, selection and analysis procedures must allow the identification of bets and operations associated with them, including their characteristics, parties and other parties involved, values, type of bet and payment method.

Single paragraph. Special attention should be paid to bets and operations associated with them that signal:

Sole Paragraph. The registration data of employees, partners, and third-party service providers must be stored by the betting operator for at least five years from the termination of the relationship.

### **CHAPTER III**

#### **PROCEDURES RELATED TO REPORTING TO COAF**

##### **Section I**

##### **Procedures for Monitoring, Selection, and Analysis**

**Art. 23** Betting operators must implement procedures for monitoring, selecting, and analyzing bets and associated operations to identify those that may indicate practices of ML/CTF or other related offenses.

**Art. 24** The monitoring, selection, and analysis procedures must enable the identification of bets and associated operations, including their characteristics, parties and other involved entities, amounts, betting modality, and payment methods.

Sole Paragraph: Bets and associated operations warranting special attention include those that signal:





I - lack of economic or legal basis;

II - incompatibility with usual activity or market practices; It is

III - possible evidence of practice of LD/FTP or other related crime.

**Art. 25.** They must also result in analysis with

Pay special attention to bets and operations associated with them that involve:

I - person involved or suspected of involvement in activities classified as the crime of money laundering and crimes against the financial system;

II - person who has committed or attempted to commit, facilitate or participate in terrorism, proliferation of weapons of mass destruction or their financing, in accordance with the provisions of Law No. 13,260, of 2016, and Law No. 13,810, of 2019;

III - person domiciled in a jurisdiction considered by the International Financial Action Group (FATF) as high risk or with strategic deficiencies in matters of PLD/FTP or in countries or dependencies qualified by the Special Secretariat of the Federal Revenue of Brazil (RFB) as taxation favored or privileged tax regime;

IV - resistance from the bettor or platform user to provide additional information requested by the betting operating agent;

I - Lack of economic or legal basis;

II - Incompatibility with usual activity or market practices; and

III - Possible indications of ML/CTF or other related offenses.

**Art. 25** Bets and associated operations involving the following must also be analyzed with special attention:

I - Individuals involved or suspected of involvement in activities typified as money laundering and financial system crimes;

II - Individuals who have committed or attempted to commit, facilitate, or participate in terrorism practices, proliferation of weapons of mass destruction or their financing, as provided in Law nº 13,260, of 2016, and Law nº 13,810, of 2019;

III - Individuals domiciled in jurisdictions considered by the Financial Action Task Force (FATF) as high-risk or with strategic deficiencies in AML/CTF, or in countries or dependencies classified by the Special Secretariat of the Federal Revenue of Brazil (RFB) as having favorable taxation or privileged tax regimes;

IV - Bettor's or platform user's resistance to providing additional information requested by the betting operator;





V - provision of false or difficult-to-verify information, notably for formalizing registration, opening an account, registering a bet or other operation on the betting platform;

VI - contribution of values for which there is suspicion as to their origin;

VII - payment of a prize that is suspected of being used for LD/FTP or fraud;

VIII - payment of a bet prize for which results are suspected of manipulation, in accordance with art. 177 of Law No. 14,597, of June 14, 2023 (General Sports Law);

IX - incompatibility between the operations carried out by a bettor and his usual pattern of activities, his occupational information or his apparent financial situation;

X - atypical movement of values in a way that may suggest the use of an automated tool by the bettor;

XI - contribution or withdrawal of values, in a short period of time, which may suggest fractionation or concealment of the operation;

XII - withdrawal, or attempted withdrawal, of resources from the bettor's transactional account, immediately after making a deposit, without placing a bet;

V - Provision of false or difficult-to-verify information, particularly for registration, account opening, bet registration, or other operations on the betting platform;

VI - Deposits of funds suspected of having questionable origins;

VII - Payment of prizes suspected of being used for ML/CTF or fraud;

VIII - Payment of betting prizes suspected of result manipulation, as per art. 177 of Law n° 14,597, of June 14, 2023 (General Sports Law);

IX - Incompatibility between the operations conducted by the bettor and their usual activity pattern, occupational information, or apparent financial situation;

X - Atypical movement of funds suggesting the use of an automated tool by the bettor;

XI - Deposits or withdrawals in a short period suggesting structuring or operation concealment;

XII - Withdrawal, or attempted withdrawal, of funds from the bettor's transaction account immediately after a deposit, without placing a bet;





XIII - misuse of an account by someone other than its holder;

XIV - evidence of the use of an account by an intermediary who places bets for others people;

XV - contributions in a quantity that may suggest the practice of betting intermediation;

XVI - betting in the betting exchange category in which there is evidence of an arrangement by two or more bettors to bet on different results, with the purpose of transferring values between them, aiming at the practice of LD/FTP;

XVII - accounts opened in the name of a politically exposed person (PEP);

XVIII - difficulty or impossibility of collecting, verifying, validating or updating registration information of bettors or platform users; It is

XIX - any characteristics that indicate, notably due to their unusual or atypical nature, possible evidence of the practice of ML/FTP or another related crime.

**Art. 26.** The analysis procedure must bring together the elements based on which it can be concluded whether or not there is a possible indication of ML/FTP practices or other related crimes.

XIII - Unauthorized use of an account by someone other than the account holder;

XIV - Indications of account use by an intermediary placing bets for others;

XV - Deposits suggesting bet brokering;

XVI - Bets in the bet exchange category indicating an arrangement by two or more bettors to bet on different outcomes to transfer funds between them, suggesting ML/CTF practices;

XVII - Accounts opened in the name of politically exposed persons (PEPs);

XVIII - Difficulty or infeasibility in collecting, verifying, validating, or updating the registration information of bettors or platform users; and

XIX - Any characteristics suggesting, notably due to their unusual or atypical nature, possible indications of ML/CTF practices or other related offenses.

**Art. 26** The analysis procedure must gather elements to conclude whether there is a possible indication of ML/CTF practices or other related offenses.







§1 The analysis and conclusion must be documented and its record must remain available for demonstration purposes to the Prizes and Bets Secretariat, regardless of whether it resulted in communication being forwarded to Coaf.

§2 The deadline for completing the analysis procedure is 30 days, counting from the date of the bet or the operation associated with it.

## Section II

### From Communication to Coaf

**Art. 27.** The betting operating agent must report to Coaf bets and other operations associated with them as to which, after analysis, it is concluded that there is evidence of ML/FTP practice or another related crime.

§1 When concluding whether there is evidence of ML/FTP or another related crime, the characteristics, parties and others involved, values, method of execution, means of payment, lack of economic or legal basis or, also, incompatibility with usual activity or market practices.

§ 2 Communications to Coaf must:

I - contain an indication of the elements on which the corresponding analysis was based and explain the reasons why it was concluded that there were signs of ML/FTP or another related crime;

§1 The analysis and conclusion must be documented, and the records must be available for demonstration to the Secretariat of Prizes and Bets, regardless of whether they resulted in reporting to Coaf.

§2 The deadline for concluding the analysis procedure is 30 days from the date of the bet or the associated operation.

## Section II

### Reporting to Coaf

**Art. 27** Betting operators must report to Coaf any bets and associated operations concluded to indicate evidence of ML/CTF, or other related offenses after analysis.

§1 The conclusion regarding evidence of ML/CTF or other related offenses should consider the characteristics, parties and other involved entities, amounts, manner of execution, payment methods, lack of economic or legal basis, or incompatibility with usual activity or market practices.

§2 Reports to Coaf must:

I - Include the elements on which the analysis was based and explain the reasons for concluding the presence of ML/CTF indications or other related offenses;





II - mention the possible existence of an intermediary in the context of the facts communicated;

III - detail the characteristics of the bet or other operation associated with them that is communicated, such as category or type of game or bet, method of payment and origin and destination of the resources involved; It is

IV - present information obtained in the procedures for identifying, qualifying and classifying the risk of bettors, users of the platform or other parties involved, which are relevant to clarify the suspicion or recognition of an unusual or atypical nature in relation to what is communicated.

§ 3 Communications to Coaf must be made, without prejudice to other applicable obligations, by the business day following the conclusion of the procedure referred to in art. 26.

**Art. 28.** Communications to Coaf provided for in this Chapter must be made in accordance with the instructions defined on its website, via the Financial Activities Control System

(Siscoaf).

**Art. 29.** The betting operating agent is prohibited from sharing any information about communication to Coaf with anyone other than Coaf itself and the Prizes and Bets Secretariat, including bettors, platform users, other parties involved

II - Mention any intermediary involved in the reported facts;

III - Detail the characteristics of the bet or associated operation being reported, such as the category or betting modality, payment method, and the origin and destination of the funds involved; and

IV - Provide relevant information obtained from the identification, qualification, and risk classification procedures of bettors, platform users, or other entities involved to clarify the suspicion or unusual or atypical nature of the reported matter.

§3 Reports to Coaf must be made by the next business day after the conclusion of the procedure referred to in Art. 26, without prejudice to other applicable obligations.

**Art. 28** Reports to Coaf provided in this Chapter must be made according to the instructions on their website, via the Financial Activities Control System (Siscoaf).

**Art. 29** Betting operators are prohibited from sharing any information about the report to Coaf with anyone other than Coaf and the Secretariat of Prizes and Bets, including bettors, platform users,





or any third parties, under penalty of liability.

### Section III

#### From the Non-Occurrence Communication to the Prizes and Bets Secretariat

**Art. 30.** The betting operating agent, if he does not identify a bet or other associated operation over the course of a calendar year that he should report to Coaf, must forward to the Prizes and Betting Secretariat the communication of the non-occurrence that treats item III of art. 11 of Law 9,613, of 1998.

Single paragraph. Non-occurrence communication must be sent via the Management System

Betting (Sigap), or through another channel created and informed by the Prizes and Betting Secretariat.

### CHAPTER IV

#### COMPLIANCE PROCEDURES IMMEDIATE IN DETERMINATIONS OF UNAVAILABILITY OF ASSETS FROM THE NATIONS SECURITY COUNCIL UNITED (UNSC)

**Art. 31.** Betting operating agents must adopt procedures to comply without delay, in accordance with art. 9th of Law No. 13,810, of 2019, resolutions of the United Nations Security Council (UNSC) or designations of its sanctions committees that determine the unavailability of

other involved parties, or any third parties, under penalty of liability.

### Section III

#### Reporting Non-Occurrence to the Secretariat of Prizes and Bets

**Art. 30** If a betting operator does not identify any bet or associated operation that should be reported to Coaf during a calendar year, they must send a non-occurrence report to the Secretariat of Prizes and Bets as described in item III of Art. 11 of Law 9,613, of 1998.

Sole Paragraph: The non-occurrence report must be submitted via the Betting Management System (Sigap) or another channel created and informed by the Secretariat of Prizes and Bets.

### CHAPTER IV

#### PROCEDURES FOR IMMEDIATE COMPLIANCE WITH ASSET FREEZING ORDERS FROM THE UNITED NATIONS SECURITY COUNCIL (UNSC)

**Art. 31** Betting operators must adopt procedures to promptly comply, under Art. 9 of Law n° 13,810, of 2019, with resolutions of the United Nations Security Council (UNSC) or designations by its sanctions committees that determine the freezing of assets owned, directly or indirectly, by individuals, legal





assets owned, directly or indirectly, by individuals, legal entities or entities subject to sanctions resulting from such resolutions or designations.

§ 1 The procedures must include monitoring the lists maintained by the UNSC and its sanctions committees with the people and entities affected by the asset unavailability determinations referred to in this article.

§ 2 Betting operating agents must also adopt procedures to fulfill the other duties assigned to them by Law No. 13,810, of 2019, notably the communication duties provided for in its art. 10 and in the sole paragraph of its art. 14.

## CHAPTER V

### KEEPING AND KEEPING OF RECORDS AND DOCUMENTS

**Art. 32.** Betting operating agents must maintain records and documents related to compliance with the provisions of this Ordinance for at least 5 (five) years, without prejudice to other duties provided for in the legislation.

## CHAPTER VI

### FINAL PROVISIONS

entities, or entities subject to sanctions resulting from such resolutions or designations.

§1 Procedures must include monitoring the lists maintained by the UNSC and its sanctions committees of individuals and entities subject to the asset freezing orders mentioned in this article.

§2 Betting operators must also adopt procedures to comply with other duties assigned to them by Law n° 13,810, of 2019, notably the communication duties provided in its Art. 10 and the sole paragraph of its Art. 14.

## CHAPTER V

### Record Keeping and Document Maintenance

**Art. 32** Betting operators must keep records and documents related to compliance with the provisions of this Ordinance for at least 5 (five) years, without prejudice to other duties provided by law.

## CHAPTER VI

### FINAL PROVISIONS





**Art. 33.** The betting operator is responsible for responding to requests made by Coaf in the frequency, form and conditions established by the aforementioned panel, and preserving, in accordance with the law, the confidentiality of the information provided.

**Art. 34.** Betting operating agents, as well as their administrators, who fail to comply with the duty established in this Ordinance are subject to the sanctions provided for in art. 12 of Law No. 9,613, of 1998, through an administrative sanctioning process in which interested parties are assured of compliance with the principles of contradictory and broad defense.

**Art. 35.** The Prizes and Betting Secretariat may issue, within the limits of its institutional powers, complementary rules with a view to complying with the provisions of this Ordinance.

**Art. 36.** The inspection, monitoring and sanctioning rules for non-compliance with the provisions set out in this Ordinance will be implemented by the Prizes and Betting Secretariat from January 1, 2025.

**Art. 37.** This Ordinance comes into force on the date of its publication.

**REGIS ANDERSON DUDENA**

**Art. 33** Betting operators must comply with requests from Coaf in the frequency, form, and conditions established by Coaf and preserve the confidentiality of the information provided as required by law.

**Art. 34** Betting operators and their administrators who fail to comply with duties established in this Ordinance are subject to the sanctions provided in Art. 12 of Law nº 9,613, of 1998, through an administrative sanctioning process that ensures the observance of the principles of adversarial proceedings and comprehensive defense.

**Art. 35** The Secretariat of Prizes and Bets may issue supplementary rules within its institutional competencies to fulfill the provisions of this Ordinance.

**Art. 36** The rules for inspection, monitoring, and sanctioning for non-compliance with the provisions of this Ordinance will be implemented by the Secretariat of Prizes and Bets starting from January 1, 2025.

**Art. 37** This Ordinance comes into effect on the date of its publication.

**REGIS ANDERSON DUDENA**





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YOSHIYASU