Compliance: A complex world

INTERGAMINGi gleans insight on compliance, fraud and anti-money laundering from experts at Afrishore, Mindway AI and BetComply, who explain how AI will have a profound impact on the sectors

iNTERGAMINGi: Could you explain your company's latest work in the compliance, fraud and anti-money laundering (AML) sectors?

Sean Effune, Afrishore founder and president:
Afrishore is a trusted offshore compliance partner supporting US-regulated gaming operators, casinos and financial services businesses. Licensed to operate in most US states, Afrishore provides specialised AML, KYC and fraud detection outsourcing solutions that align with federal and state regulatory standards. We are currently obtaining licences in the remaining six states, ensuring full operational coverage and complete compliance.

Our services span transaction monitoring, risk profiling, player and customer due diligence, suspicious activity identification and regulatory reporting. These are delivered by compliance professionals trained in both US gaming regulations and South African financial crime legislation under the Financial Sector Conduct Authority (FSCA), the frameworks of which mirror those of the US and UK. This dual understanding allows Afrishore to bridge international regulatory expectations seamlessly.

Paula Murphy, head of business development at Mindway AI:
Mindway AI specialises in developing innovative solutions for responsible gambling and player protection, so this is exactly what our main solution GameScanner does. It uses artificial intelligence, neuroscience, human psychologist experts' assessments and machine learning to analyse player behaviour and identify patterns indicative of at-risk or problematic gambling.

It provides operators with real-time insights into player behaviour and enables targeted interventions to prevent gambling-related harm.

SEAN EFFUNE, FOUNDER AND PRESIDENT AT AFRISHORE:

"The US gaming and igaming landscape continues to evolve under growing regulatory pressure, technological innovation and cross-state complexity."

Our commitment to accuracy is validated by Gaming Laboratories International, which found that GameScanner matches human expert assessments in identifying at-risk players in at least 87 per cent of cases. But we don't stop there. Innovation is key to what we do, so to stay at the forefront of responsible gaming, Mindway AI focuses on continuous research and development.

We strive to improve our existing solutions and develop new tools that address emerging challenges in the industry. This includes refining algorithms that may be based on a specific vertical, enhancing our data analysis capabilities and expanding our understanding of player behaviour and risk factors. With algorithms trained on the operator's own player data, operators can have a customised solution that reflects nuances such as regulatory requirements, cultural differences, product type and customer profiles. We are neither an out-of-the-box nor a black box solution!

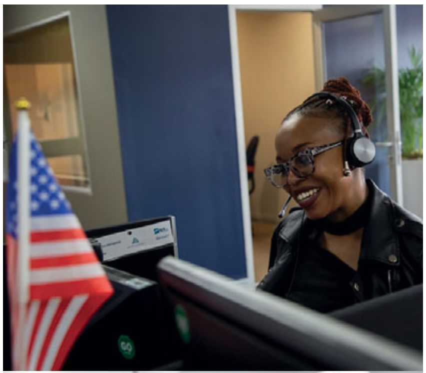
BetComply CEO Daniel Brookes:
As a company, we've been operating for two years, but the people within BetComply bring decades of combined experience. These two years have been incredibly promising; we've filled a gap that the industry was clearly asking for.

From a compliance perspective, we've seen how operators are being hit with an ever-growing mix of regulatory demands that often overwhelm them. It's no longer just about AML and responsible gaming; it's advertising rules, ISMS/ISO frameworks, outsourcing obligations, technical compliance around SAFE and Vault reporting and segregation of funds. The list goes on.

Running a regulated operation today means managing a full ecosystem of obligations. It's no longer "run a casino and fight money laundering." It's "run a compliant technology business under constant regulatory evolution."

The nature of our work always depends on the client's profile, but take a new market entrant as an example; they might ask us to design, implement and train their teams for compliance in a specific jurisdiction.

We start by reviewing their documentation, policies, processes and the tools they use. We then produce a detailed improvement plan that



Afrishore offers business protection outsourcing services to the igaming industry

makes the framework feasible, compliant and effective. Tools that don't work or add no value are replaced. Once we've implemented the new framework and trained the staff, we typically bring in an independent auditor after three to six months to validate its effectiveness.

From there, we stay involved through periodic reviews and remain available as an ongoing support function. The goal is always the same: a framework that's practical, efficient and genuinely risk-based.

What products and solutions do you offer the igaming industry and how are they evolving to meet industry needs?

Effune, Afrishore:
Our teams manage high-volume verification, monitoring and reporting processes with a compliance-first mindset that reduces risk exposure and supports licence retention.

Our key services include KYC onboarding and verification, in which our teams provide clients with clear document requirements and verification guidance to ensure frictionless onboarding while adhering to strict US regulatory frameworks. Our transaction monitoring and fraud detection service offers real-time surveillance of deposits, withdrawals, bonuses and in-game activity to detect unusual patterns or co-ordinated fraud attempts.

The preparation of Suspicious Activity Reports (SARs), Currency Transaction Reports (CTRs) and ongoing compliance documentation through our regulatory reporting support ensures clients are audit-ready.

Offshore teams can scale up rapidly during promotional seasons, holidays or sporting events through our seasonal scalability and workforce resilience service, maintaining quality and compliance continuity even under high workloads.

Finally, South Africa's favourable regulatory infrastructure and skilled workforce allow Afrishore to deliver a compliant, high-quality service at a significantly lower cost compared to onshore operations.

These same compliance frameworks extend into insurance claims verification, travel risk management and healthcare record validation, where identity fraud and financial misreporting pose similar regulatory challenges. Afrishore's cross-sector expertise ensures that clients in any industry benefit from robust compliance mechanisms supported by certified AML and data protection protocols.

Murphy, Mindway AI:
As artificial intelligence advances, our solutions evolve through robust R&D and tech expansion. The European Artificial Intelligence (AI) Act guides ethical and responsible innovation. By prioritising R&D by brainstorming with both business development and tech teams, we explore innovative technologies to enhance our offerings.

Additionally, upcoming collaborations with AI-focused organisations outside the industry will introduce fresh perspectives, driving further innovation. These efforts ensure that we continue to refine our solutions, staying at the forefront of AI advancements while maintaining compliance with rigorous standards.

Brookes, BetComply:
ComplyCheck is built around modular assessments. Each module covers a specific jurisdiction or regulatory area, allowing operators to measure their current operations against local rules or technical standards – as a self-service audit.

We translate complex legislation and technical jargon into plain, actionable questions with the legal sources behind them. For example, if you want to assess your duty of care compliance in the Netherlands, the module walks you through every relevant aspect, from player monitoring to intervention processes, ensuring no blind spots.

At the end, you get a clear snapshot of your compliance status in a central dashboard. You can then share the report with us in one click for an expert review and targeted recommendations.

We've added new modules and jurisdictions and are about to launch a subscription model, letting clients rotate modules as needed – a more efficient way to stay compliant across markets.

What trends are you observing in the compliance, fraud and anti-money laundering sectors right now?

Effune, Afrishore:
The US gaming and igaming landscape continues to evolve under growing regulatory pressure, technological innovation and cross-state complexity. Key compliance trends include enhanced regulatory scrutiny, with federal and state agencies increasing their oversight of AML and KYC practices, particularly within online and mobile gaming environments. Elsewhere, machine learning tools are improving real-time fraud detection, enabling automated risk flagging and behaviour-based surveillance. Vendor and third-party accountability is another key trend; operators are now responsible for ensuring that all partners, including offshore vendors, comply with AML and data protection standards, strengthening the demand for trusted providers like Afrishore.

Integration with responsible gaming protocols is important because AML and compliance frameworks are increasingly linked to player safety, including affordability checks, responsible gaming alerts and age verification mechanisms.

Finally, cross-jurisdictional regulation means operators must navigate multiple state frameworks, each with distinct compliance and reporting requirements.

Afrishore's regulated delivery model directly addresses these trends. Our in-house Compliance Training department ensures that every employee keeps pace with US federal and state AML expectations through mandatory elearning, assessments and continuous refresher sessions.

Seasonal spikes in gaming activity such as holidays, major sporting events or casino promotions demand both scalability and unwavering compliance control. Afrishore's scalability model is designed to expand operations swiftly while preserving AML and fraud integrity across every transaction.

Through a pipeline of over 1,500 pre-vetted candidates, Afrishore can rapidly deploy trained agents for short-term or long-term assignments. Every resource is screened for technical and regulatory knowledge to meet the highest US compliance standards.

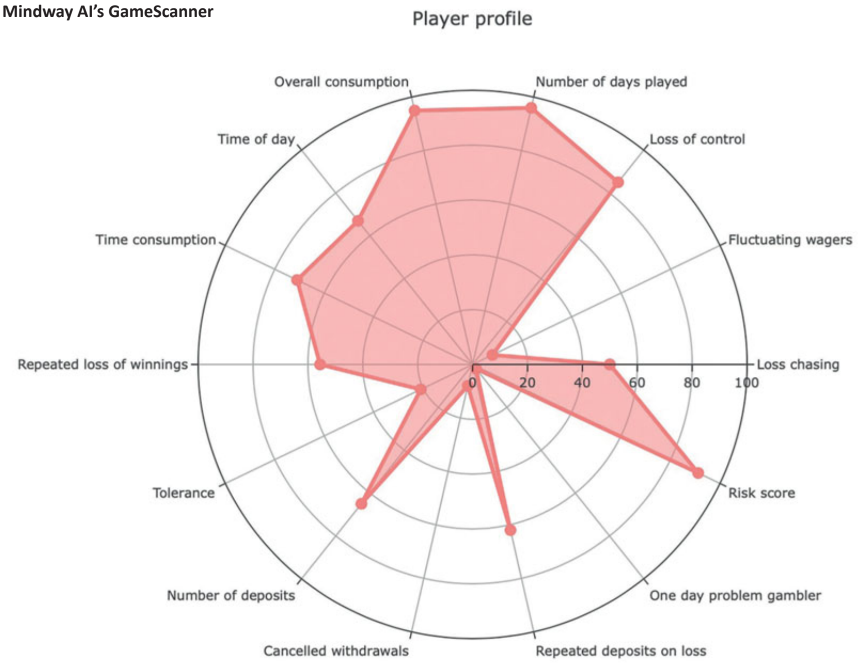
During peak activity, Afrishore maintains layered supervision, real-time quality checks and dedicated compliance monitoring teams to ensure no degradation in oversight or reporting accuracy. This operational discipline differentiates Afrishore from conventional business protection outsourcing (BPO) providers.

Murphy, Mindway AI:
AI will play an increasingly vital role in enhancing igaming regulatory compliance, but machines alone can't replace human expertise. Legal and compliance professionals, like our partners at BetComply, bring in-depth knowledge of the regulatory landscape that's irreplaceable. At Mindway AI, we blend essential human expertise with advanced technology, informed by diverse viewpoints from customers, regulators and our expert panel.

Our technical team, with expertise in machine learning, cognitive science and mathematics, holds PhD's, master's and bachelor's degrees to help push the boundaries of AI capabilities. Meanwhile, our business development team leverages over 30 years of combined industry experience to identify unique business needs, tailoring solutions that foster growth while ensuring compliance.

AI's role is to enhance human efforts by identifying patterns and providing insights that would be difficult to spot manually. As AI

Mindway AI's GameScanner



PAULA MURPHY, HEAD OF BUSINESS DEVELOPMENT AT MINDWAY AI:

"AI will play an increasingly vital role in enhancing igaming regulatory compliance, but machines alone can't replace human expertise."

becomes more sophisticated, it will support compliance efforts by predicting potential pitfalls and enabling proactive solutions. However, the combination of AI tools with human insight and experience will drive the most impactful advancements in regulatory compliance, maintaining a balance that fosters both innovation and adherence to industry standards.

Brookes, BetComply:
Your product, payment flow and licensing structure determine almost everything, and there's no one-size-fits-all solution. A locally regulated slot operator with closed payment loops faces very different risks from a crypto casino under an offshore licence offering multiple verticals.

For example, you might know everything about running a casino, but do you know the specific fraud risks of accepting prepaid cards while offering third-division football betting under a Curaçao licence? It's a completely different ball game.

In practice, this needs a top-down approach: understanding your specific risk exposure; building frameworks that are flexible enough to adapt as those risks change (and they will change); hiring and training competent staff to implement those frameworks; and validating them regularly through third-party reviews or audits. That's how compliance stops being a tick-box exercise and becomes a living control system.

What does the future look like for these sectors?

Effune, Afrishore:
The future of compliance within the gaming and AML landscape will be defined by automation, collaboration and consistency across jurisdictions. Over the next few years, several shifts will shape the industry.

Machine learning models will enhance anomaly detection and streamline regulatory reporting processes, reducing manual oversight errors.

There will also be standardisation across states. The US is moving toward harmonised AML/KYC frameworks, making cross-state operational compliance more predictable for licensed operators.

As regulation intensifies, US operators will increasingly seek global partners like Afrishore that can demonstrate verifiable compliance governance and transparent audit trails.

The growth of synthetic identities, cryptocurrency-related laundering and cross-platform betting will demand more advanced digital verification and blockchain-enabled tracing tools.

Regulators are pushing for greater transparency in data usage, encryption and storage, heightening the importance of offshore compliance alignment.

Afrishore is positioned to lead this evolution by integrating AI-enabled risk detection, biometric verification and enhanced compliance analytics into our operational model. These innovations are also being applied to healthcare, travel and insurance compliance frameworks, where fraud detection and verification standards are rapidly digitising. Our commitment to regulatory rigour, data protection and ethical conduct ensures that Afrishore remains a trusted compliance partner for industries that rely on integrity and accountability.

Murphy, Mindway AI:
The evolving landscape of igaming compliance highlights a shift towards integrating AI into regulatory frameworks. Recent news of Spain's DGOJ [Dirección General de Ordenación del Juego] mandating a specific AI risk model is a hot topic for us right now. While the complexity is challenging, operators should customise and continually refine their models based on customer behaviour and product specifics. Through extensive research, we've learned that a one-size-fits-all approach isn't optimal; customisation is key. Some are concerned about regulators prescribing specific compliance methods rather than setting the framework by saying their role should be outlining the "what," not the "how." Despite this, we've examined the mandated model and are confident it integrates seamlessly with GameScanner.

Our solution not only meets regulatory requirements but also excels with enhanced analytics and automated case management.

Our experience, such as adapting to Dutch regulations by the October 2024 deadline and partnering with the Hellenic Gaming Commission (HGC), represents pivotal changes for the global gaming industry. As one of the first collaborations between an international gambling regulator and a world-class AI technology provider, the partnership with the HGC sets a new benchmark for regulatory practices and player protection measures. Ultimately, my advice to operators is to collaborate with field experts to ensure compliance, while running additional models to suit your operational needs. This dual approach ensures you meet regulatory demands and continue effective operations.

DANIEL BROOKES, CEO AT BETCOMPLY:

"Running a regulated operation today means managing a full ecosystem of obligations. It's no longer 'run a casino and fight money laundering.' It's 'run a compliant technology business under constant regulatory evolution.'"

Brookes, BetComply:
The word on everyone's lips is AI. It won't just power CRM, personalisation or player engagement; criminals will use it too. With deepfakes, synthetic IDs and automated system manipulation, it's already getting harder to tell what's real and what's fabricated.

If criminal groups start training AI models to understand and evade AML detection systems, the risk multiplies exponentially. For the industry and regulators alike, this means one thing: we need to stay ahead of the curve. Compliance has always been a race between control and circumvention, and AI is about to make that race much faster.

Do you have any other observations regarding compliance, fraud and AML in igaming?

Effune, Afrishore:
Afrishore partners with a wide range of online operators, from casinos and sportsbooks to fintech, travel, insurance and healthcare platforms, to deliver comprehensive compliance and risk management solutions.

Afrishore's offshore delivery model combines regulatory precision, technological innovation and human oversight. This balance enables our clients, whether in gaming, travel, insurance or healthcare, to meet their AML, fraud and compliance obligations without sacrificing operational agility or customer experience.

Murphy, Mindway AI:
Artificial Intelligence is playing a pivotal role in addressing the issue of problem gambling as in many other altruistic applications outside of the industry, as we saw when we attended the UN's AI for Good Summit in Geneva, Switzerland this past summer. The integration of AI technologies such as machine learning algorithms and predictive analytics enables the development of sophisticated tools to detect and mitigate problematic gambling behaviour.

GameScanner analyses vast datasets to identify patterns and anomalies in user behaviour, allowing operators to proactively intervene and provide support to individuals at risk. The increasing emphasis on responsible gambling practices has prompted leading industry operators to invest in AI-driven solutions, not only to safeguard users but also to enhance the overall integrity and sustainability of the gaming ecosystem. As discussions around ethical AI and player protection gain momentum across the globe, the role of artificial intelligence in detecting and addressing problem gambling continues to be a focal point in shaping the future of the industry.

However, the point still remains that at Mindway AI, we do not wish to fully rely on just AI, which is why the human expert assessment we have is still, and always will be, an integral part of what we do. Their vast expertise in areas including gambling addiction, gambling research and psychology is invaluable in meticulously analysing several thousand player gambling patterns. Their assessments are used to educate and continuously update GameScanner's algorithm. We believe the human element is crucial in providing results to very high levels of accuracy.

Brookes, BetComply:
We're closely following market developments in Finland and New Zealand, which are both moving towards regulation, and we're already preparing several clients for entry.

The Netherlands and the UK remain high priorities due to ongoing regulatory developments that affect day-to-day operations.

In Curaçao, the introduction of the LOK [National Ordinance on Games of Chance] regime and new AML framework is attracting major attention. Many operators there are facing, for the first time, the need to implement proper compliance structures that align with global standards.