

Risk Policies for Crypto Usage

1. Purpose

This policy establishes guidelines for the responsible and secure use of cryptocurrency in Weplay Network's iGaming services. It outlines procedures for handling crypto payments to ensure compliance, mitigate financial and reputational risks, and safeguard customer assets.

2. Scope

This policy applies to all crypto transactions conducted by WP Consulting N.V. across B2B and B2C business lines, including network poker, casino, sportsbook, and cashier services.

3. Compliance and Regulatory Adherence

AML/KYC Requirements: All crypto transactions must adhere to Anti-Money Laundering (AML) and Know Your Customer (KYC) standards. Crypto transactions are only permitted from wallets and exchanges compliant with these standards.

Curacao Regulations: WP Consulting N.V. is obligated to follow Curacao's regulatory framework regarding cryptocurrency usage. Compliance with any updates to Curacao's guidelines on crypto and iGaming is required.

Ongoing Monitoring: Weplay Network must continuously monitor changes in crypto-related regulations in jurisdictions where clients are located and promptly update practices to maintain compliance.

4. Customer Risk Management

Volatility Risks: Crypto assets' volatility is communicated to clients to inform them of potential fluctuations in transaction values.

Transaction Limits: Set clear limits for crypto deposits and withdrawals, with additional restrictions for high-value or high-risk jurisdictions.

Transaction Verification: Each transaction should be verified for legitimacy and adherence to platform rules through blockchain analysis and fraud prevention tools.

5. Operational Risk Management

Cold Storage Security: Crypto assets held by Weplay Network should be secured in cold storage to minimize unauthorized access and reduce risk.

Security Protocols: Implement robust encryption, multi-factor authentication (MFA), and transaction alerts for all crypto activities.

Custodial Services: Use only reputable, insured custodial services for managing client and operational funds.

6. Financial Reporting

Transaction Reporting: Ensure all crypto transactions are accurately recorded in financial reports with detailed records of amounts, wallet addresses, and transaction details.

Tax Compliance: Maintain records and ensure compliance with tax reporting requirements relevant to cryptocurrency transactions within operating jurisdictions.

7. Anti-Fraud and AML Controls

Transaction Monitoring: Conduct ongoing transaction monitoring to detect potential fraud, money laundering, or suspicious activities.

Enhanced Due Diligence (EDD): For high-risk clients or transactions, apply EDD measures, including background checks on source of funds and wallet origins.

Blacklist Screening: Conduct regular screenings of wallet addresses against global watchlists to prevent transactions with sanctioned or high-risk entities.

8. Customer Education and Support

Information on Crypto Risks: Provide educational resources on the potential risks and benefits of crypto usage, particularly regarding security and volatility.

Support for Crypto Issues: Establish a support system for customers facing issues with crypto deposits or withdrawals, ensuring quick resolutions while adhering to compliance standards.

9. Policy Review and Updates

Annual Review: This policy must be reviewed annually or whenever there is a significant change in crypto regulations or Weplay Network's business operations.

Staff Training: Regular training sessions on crypto-related risk management and compliance requirements will be conducted for employees handling crypto transactions.

WP Consulting N.V.

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