

Versus Odds B.V.

Crypto Payments Policy

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Document Version Control

Versus Odds B.V. – Crypto Payments Policy	
VERSION CONTROL	
Current version	1.00
Effective Date	2025-07-01
Sign Off Date	2025-07-01
Document Owner	Senior Compliance Officer / MLRO
Next Review Date	2026-07-01
Comments	The policy will be reviewed on the following basis: No less than once annually, with such review to be initiated by the Policy owner approximately one month prior to the date following 12 months from which the procedure was last approved. · In response to any changes in relevant regulation and/ or legislation. · In response to general guidance notes or best practice guidance issued by any relevant regulator. · In response to any regulatory action taken · In response to findings of a relevant internal or external audit; or · Upon request of management.
Purpose	Amendments to reflect regulatory requirements according to the AML Policy template guidelines

Version history

Version	Date	Author	Purpose
1.0	2025-07-01	Versus Odds B.V.	Creation of the first Crypto Payments Policy

Crypto payments

1.1 Compliance with regulatory requirements

Versus Odds B.V. is committed to ensuring compliance with all applicable regulations governing Virtual Financial Assets (VFA). This includes adherence to Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) regulations, as well as other relevant financial regulations. The Company will implement and maintain robust systems and controls to prevent the use of Virtual Assets for illicit activities. This includes conducting thorough due diligence, monitoring transactions, and reporting any unusual activities to the Curaçao Gaming Authority (GCA) and Curaçao FIU. This part outlines the use and acceptance of VFAs, complying with applicable laws and regulatory standards, in particular, VFAs that involve the use of Distributed Ledger Technologies (DLT).

1.2 Risks with crypto payments

Cryptocurrency is a decentralized digital money secured by cryptography and based on blockchain technology - that is, a distributed digital ledger that keeps a secure, transparent, and decentralized record of transactions. Cryptocurrency is almost impossible to counterfeit or double-spend, so it might prove valuable to online gambling sites looking to become more secure and transparent. However, their decentralized structure allows crypto to exist outside the control of governments and central authorities. Therefore, this new form of value is extremely unregulated.

Risks using cryptocurrency:

- Lack of legal framework;
- Volatility;
- Hacking concerns.

Cryptocurrency is an exciting, technology-powered form of value that promises to change many aspects of people's lives - including their gambling habits. However, while promising, this technology is still riddled with loopholes and issues that need to be addressed to protect consumers and the gambling industry as a whole. Apart from focusing on all the benefits of digital currencies, Versus Odds B.V. is aware of its potential risks and do its best to mitigate them.

1.3 Un-hosted wallets

Un hosted wallets, defined as digital wallets that are not managed or hosted by a third-party service provider, are subject to stringent transparency requirements. The Company is aware that transparency regarding the owner and beneficiary of un-hosted wallets is paramount for regulatory compliance and mitigating risks associated with Money Laundering (ML) and Terrorist Financing (TF). Versus Odds B.V. will ensure that players utilizing un-hosted wallets for gaming transactions provide comprehensive information regarding their identity, including but not limited to, full name, address, and official identification documents. The Company will conduct thorough due diligence procedures to verify the identity of un-hosted wallet owners, in line with established AML & CFT standards. Any unusual activity or transactions that raise concern regarding the source or destination of funds will be promptly reported.

1.4 Custodial wallet services

Custodial wallet services, facilitating the exchange of Virtual Currencies (VC) to fiat, vice versa, or VC-to-VC transactions, are subject to rigorous monitoring and compliance measures to mitigate risks associated with money laundering and terrorist financing. The Company, when offering custodial wallet services through third-party Custodial Wallet Providers, will implement robust Customer Due Diligence (CDD)

procedures to ascertain the source of funds (SOF) and verify the identity of users engaging in VC transactions, including minimum age requirements. Comprehensive KYC (Know Your Customer) protocols will be established to collect relevant information, including personal identification details and transaction histories, from customers. The Company will implement effective transaction monitoring systems to detect and prevent suspicious activities within custodial wallet services.

1.5 Volatility of VFAs

The values of VFAs relative to fiat currencies (e.g. EUR) may be subject to significant volatility and fluctuation. As a result, the value of VFAs may increase or decrease substantially over a short period of time. The Company hereby advises all players that VFAs are subject to significant fluctuations in value (vis-à-vis fiat currencies) due to market volatility. By engaging in transactions involving VFAs, all players acknowledge and accept the inherent risks associated with such volatility. Players are strongly encouraged to exercise caution and to consider these risks when making deposits, withdrawals, or any other financial transactions involving VFAs. All players acknowledge that due to the risks associated with the volatility of the value of VFAs relative to fiat currencies, they may deposit or withdraw a sum which is higher or lower in value when compared to fiat currencies than anticipated.

1.6 Coin Mixing Policy

The Company has a strict anti-coin mixing policy. This is in accordance with the Company's AML procedures outlined in the terms of service. If deposits & withdrawals are suspected of being attempts to mix coins, the Company reserve the right to hold withdrawals until completion of one of the following procedures:

- Withdrawal is refunded to the address in which the deposit was made from;
- Withdrawal is sent after full completion of account verification & KYC;
- Withdrawal refund & sufficient gameplay is reached.

The Company will always try to ensure every matter is resolved & the above can be modified to suit specific situations.

1.7 Signatory

Signed by:

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Mark Cauchi
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Versus Odds B.V.