

Cryptocurrency Risk Management Policy

Oxilium N.V.

Updated 5th of March 2025

1. Introduction

This policy outlines the procedures and controls in place for managing the risks associated with using USDT (Tether) as a deposit and withdrawal method on Bahisbey.com. These measures are designed to ensure compliance with relevant regulations, safeguard client assets, and maintain the integrity of our operations.

2. Payment Processing

Spinmatic Limited, with its registered address at Konitsis 9A, Larnaca 6037, Cyprus, registration No. HE 460645, is a wholly owned subsidiary of Oxilium N.V. and provides payment services as an agent under the agreement between the companies.

Bahisbey's payment processing and custodial wallet services are provided by UAB Star Ventures, operating under the brand name CoinPayments. UAB Star Ventures is a regulated entity based in Lithuania, ensuring that all virtual asset services comply with European Union regulations and industry best practices.

3. Client Account Management

- **Unique Accounts:** Each Bahisbey client maintains unique addresses. These addresses are specific wallet address for USDT deposits. This wallet is generated after the client selects the deposit amount in fiat currency, ensuring traceability and individual account management.
- **Virtual Asset Services (Transaction Processing):** CoinPayments processes all USDT deposits and withdrawals on the Bahisbey platform.
- **Virtual Asset Services (Compliance and Reporting):** UAB Star Ventures adheres to stringent KYC and AML requirements, providing Bahisbey with the necessary tools and support to comply with international regulations. This includes automated transaction monitoring, real-time reporting, and the ability to flag and investigate suspicious activities.
- **KYC Checks:** As part of our Anti-Money Laundering (AML) Policy, all clients must complete Know Your Customer (KYC) verification. This includes submitting identification documents and other relevant information to verify their identity.
- **Custodial Wallet Services:** CoinPayments provides both hot and cold wallet services to Bahisbey. Hot wallets are used to facilitate day-to-day transactions and are secured with advanced encryption methods.
- **Reserve Management** Upon confirmation of a deposit the Crypto currency - USDT are not converted and are retained as they maintain a stable fiat value.

4. Deposit and Withdrawal Policy

- **Funding Wallet Consistency:** Clients who deposit USDT into their Bahisbey accounts are permitted to withdraw only to the same wallet address from which the deposit was made. This policy is enforced to prevent fraudulent activities and ensure the traceability of funds.
- **Evidence of Wallet Ownership:** To further secure transactions, clients must provide evidence of ownership of the funding wallet before any withdrawals are processed. Acceptable forms of evidence include:
 - Screenshots of the wallet interface showing the address and balance.
 - Transaction history that clearly indicates the deposit to Bahisbey.
 - Other documentation as deemed necessary by our compliance team.

5. Transaction Monitoring and Security

- **Real-Time Monitoring:** All USDT transactions are monitored in real time to detect unusual or suspicious activities. Alerts are generated for transactions that fall outside of typical patterns, triggering further investigation.
- **Cold and Hot Wallet Management:** Bahisbey maintains a secure system for managing USDT funds. The majority of client funds are stored in cold wallets, which are offline and protected from cyber threats. Only operational funds necessary for daily transactions are kept in hot wallets, secured through multiple layers of encryption and authentication.

6. Regulatory Compliance

- **AML and Regulatory Adherence:** Bahisbey adheres to all applicable AML regulations and ensures that its operations are fully compliant with European and international laws. CoinPayments assists with conducting regular audits to maintain compliance and address any emerging risks.

7. Contingency Planning

- **Crisis Management:** In the event of a security breach, regulatory challenge, or significant market disruption, Bahisbey has a crisis management plan in place. This plan includes protocols for securing client funds, communicating with affected users, and restoring normal operations.
- **Insurance:** Bahisbey, as mentioned above, holds reserves in cold and hot wallets to facilitate day-to-day transactions. This ensures mitigation of potential losses from unforeseen events, including cybersecurity incidents.

8. Policy Review and Updates

This policy is reviewed regularly to ensure it remains effective in managing risks associated with USDT transactions. Updates to the policy are made in response to changes in the regulatory environment, technological advancements, or new threats.