

Cryptocurrency Risk Management Policy
Godbunny B.V.
Last Updated: 23rd of July 2025

1. Introduction

This policy outlines the procedures and risk controls implemented by Godbunny B.V. to manage the use of cryptocurrencies as a deposit and withdrawal method on its platform. The objective is to ensure compliance with applicable regulations, protect client assets, and maintain the security and integrity of our operations.

2. Payment Processing Structure

Maitlis Limited, a wholly owned subsidiary of Godbunny B.V., is registered at Chloridos 3, 6047, Larnaca, Cyprus (Registration No. HE 415461). Maitlis Limited acts as a payment services agent under a formal agreement with Godbunny B.V.

All cryptocurrency payment processing and custodial wallet services are provided by GammaG LLC, operating under the brand name *GammaG*. GammaG is a regulated entity based in Georgia and ensures that all virtual asset-related services are conducted in compliance with European Union regulations and industry best practices.

3. Client Wallet and Account Management

- **Dedicated Wallet Addresses**
Each client is issued a unique wallet address to process crypto deposits. This wallet is generated after the client selects the deposit amount in fiat currency, ensuring traceability and individual account management.
- **Transaction Processing**
All cryptocurrency deposits and withdrawals on the Godbunny platform are securely processed by GammaG.
- **Compliance and Monitoring**
GammaG implements robust compliance procedures, including Know Your Customer (KYC), Anti-Money Laundering (AML), and blockchain-based transaction monitoring. This includes automated screening, real-time alerts, and the ability to flag and investigate suspicious activities.
- **KYC Verification**
In accordance with Godbunny's AML policy, all clients are required to complete a KYC process, including the submission of government-issued identification and other relevant documentation such as proof of address and source of wealth and source of wallet ownership to verify their identity.
- **Custodial Wallet Infrastructure**
GammaG provides both hot (online) and cold (offline) wallet storage solutions. Hot

wallets are used for daily operations and are secured with strong encryption protocols. Cold wallets are kept offline to protect client funds from cyber threats.

- **Reserve Management**

Upon confirmation of a deposit, volatile cryptocurrencies (e.g., BTC, ETH) are automatically converted into EUR to protect against market volatility. However, stablecoins such as USDT and USDC are not converted and are retained in their original form, as they maintain a stable fiat value.

Godbunny holds fiat reserves in the same GammaG merchant account to facilitate withdrawals and ensure liquidity. All deposits are monitored to verify that they are wagered in accordance with the platform's Terms and Conditions and are not used for trading or speculative purposes.

4. Deposit and Withdrawal Controls

- **Wallet Consistency Requirement**

Clients who deposit using cryptocurrency may only withdraw funds to the same wallet address used for the original deposit. This policy is enforced to prevent fraud and ensure the traceability of transactions.

- **Proof of Wallet Ownership**

Before processing any withdrawal, clients must provide evidence of ownership of the deposit wallet. Acceptable forms of proof include:

- A screenshot of the wallet interface showing the wallet address and balance
- A transaction history that includes the deposit made to Godbunny
- Additional documentation as requested by the compliance team

5. Transaction Surveillance and Security

- **Real-Time Monitoring**

All crypto transactions are monitored in real time to detect anomalies, suspicious activity, or non-compliance with the platform's policies. Alerts are automatically triggered for review and investigation.

- **Wallet Segregation and Security**

Operational funds are stored in hot wallets and protected with multi-layered encryption and authentication. The majority of client funds are held securely in cold wallets, disconnected from the internet and safeguarded from cyber threats.

6. Legal and Regulatory Compliance

- **AML and Regulatory Adherence**

Godbunny B.V. ensures compliance with all applicable Anti-Money Laundering (AML) laws and regulations under European and international standards.

- Independent Audits

Regular audits are conducted with the assistance of partners such as CoinPayments to ensure ongoing compliance and the early identification of emerging risks.

7. Contingency and Incident Response

- Crisis Management

In the event of a security breach, market disruption, or regulatory investigation, Godbunny has a crisis response framework in place. This includes steps to secure client funds, inform affected users, and resume platform operations promptly. All such responses are coordinated with GammaG.

- Risk Mitigation via Wallet Management

Godbunny mitigates potential loss from unforeseen events—including cybersecurity threats—by holding client assets across segregated hot and cold wallets and maintaining sufficient liquidity reserves.

8. Policy Governance

This policy is reviewed regularly to ensure its continued effectiveness and alignment with the evolving regulatory, operational, and technological landscape. Any material updates will be reflected in a revised version of this document and communicated as appropriate.