

Crypto Management Policy for ABC Interactive NV

1. Purpose and Scope

This Crypto Management Policy outlines the governance framework and operational guidelines for the management of cryptocurrencies within ABC Interactive NV to ensure compliance with Curacao's regulatory requirements and international standards for anti-money laundering (AML), combating the financing of terrorism (CFT), and responsible gaming practices.

This policy applies to all employees, management, contractors, and vendors involved in cryptocurrency transactions on the platform.

2. Definitions

- Cryptocurrency: Digital or virtual currency secured by cryptographic techniques, such as Bitcoin (BTC), Ethereum (ETH), and other tokens supported by the platform.
- Wallet: A digital repository used to store and manage cryptocurrencies, including hot and cold wallets.
- Cold Wallet: A wallet not connected to the internet.
- KYC: Know Your Customer process to verify the identity of users.
- AML: Anti-Money Laundering measures to prevent illicit activities.

3. Wallet Management Framework

3.1 Wallet Types and Use

- Cold Wallets:
 - Used for operational purposes to manage daily deposits, withdrawals, and transfers
 - Transfers to and from cold wallets will require authorization.

3.2 Wallet Access Controls

Only authorized personnel will have access to the private key and wallet. The cold wallet will require periodic reconciliation. Any wallet transfer will require approval from at least two senior staff members.

4. Transaction Monitoring and AML Compliance

4.1 KYC and Identity Verification

All users must complete KYC verification prior to engaging in cryptocurrency transactions, in accordance with the Curacao licensor's requirements. The KYC process occurs on the PSP side in order to create a client wallet and will collect:

- Full name
- Date of birth
- National ID/passport
- Address proof

4.2 AML Measures and Suspicious Activity Monitoring

Transactions will be monitored for patterns indicating potential money laundering or terrorist financing activities. Thresholds for Reporting: Any single or cumulative transactions exceeding [€2,000] will trigger enhanced due diligence (EDD) and be reported to relevant authorities as needed. Suspicious Activity Reports (SARs) will be submitted promptly to Curacao authorities if suspicious patterns are identified.

5. User Protection and Responsible Gaming

Users must be able to set personal deposit and withdrawal limits. Cryptocurrency transactions will reflect instantly in user accounts, ensuring transparency. The platform will educate users on the volatility of cryptocurrencies, including responsible gaming disclaimers when using crypto deposits. Refund policies for cryptocurrency deposits will align with platform terms and regulatory requirements.

6. Regulatory Compliance and Reporting

The platform will comply with Curacao's gambling and financial regulations. Records of cryptocurrency transactions will be maintained in the payment solution provider's database. ABC Interactive NV will cooperate fully with Curacao's licensor and relevant authorities for audits and inquiries.

7. Training and Awareness

Staff involved in cryptocurrency operations will undergo regular training on AML/CFT regulations, cryptocurrency transaction processes, and fraud detection and reporting.

8. Policy Review and Updates

This Crypto Management Policy will be reviewed annually or as needed to remain in alignment with changes in Curacao's regulations, industry best practices, and evolving cryptocurrency risks.

9. Policy Approval and Effective Date

This policy is effective as of 01.01.2024 and approved by Antonis Mavrommatis (UBO). It will remain in effect until further updates or revisions are approved by management.

10. Currencies Used

The currencies that will be used for deposits on the websites provided by the PSP are: BTC, ETH, LTC, BTCH, USDT, BNB, Doge, Tron, Ripple, Binance Coin, Cardano

11. Acknowledgment

By implementing this policy, ABC Interactive NV commits to maintaining the highest standards of security, compliance, and customer protection in its cryptocurrency operations.