

GENERAL RISK POLICY FOR CRYPTOCURRENCY USAGE

A2F B.V.

Policy Version: 1.0 (Effective: 29 of December 2025)

Legal Entity Name	A2F B.V.
Legal Status	Limited Liability Company (registered under the laws of Curaçao)
Company Number	151745
Registered Address	Abraham Mendez Chumaceiro Boulevard 50, Willemstad, Curaçao
License Number (GCB)	OGL/2024/298/0109
Operational Websites	apostasbf.com / aposrasnow.com / bet-bra.com / betuppro.com / bolsadeaposta.com / captainpunt.com / drinbet.com / fulltbet.com / peakodds.com / punterplay.com / sharpbet.com / superodds88.com / tradeball.com / oddjusta.com
Responsible Office	Compliance Department
Next Review Date	December 2026

1. Policy Statement

A2F B.V. is committed to identifying, assessing, and mitigating risks associated with the use of cryptocurrencies within its business operations. This policy forms part of the company's wider AML/CFT framework and complies with Curaçao Gaming Authority (CGA) requirements and Financial Action Task Force (FATF) recommendations. The objective is to ensure that cryptocurrency transactions do not expose the business to money laundering (ML), terrorist financing (TF), or proliferation financing risks.

2. Scope and Applicability

This policy applies to all cryptocurrency-related activities within A2F B.V., including player deposits, withdrawals, and transactions processed through virtual assets. It is binding on all employees, contractors, affiliates, and third-party service providers engaged in cryptocurrency handling.

3. Regulatory Framework

A2F B.V. complies with:

- FATF Recommendation 15 (New Technologies) and 16 (Wire Transfers)
- Curaçao AML/CFT legal framework and FIU obligations
- International sanctions lists and screening requirements

Only cryptocurrencies permitted under Curaçao law and CGA guidelines will be accepted.

4. Risk Identification

Inherent risks associated with cryptocurrency include:

- High level of anonymity and pseudonymity
- Rapid cross-border transaction capability
- Potential use of mixers, tumblers, or privacy-enhancing coins

- Vulnerability to unregulated exchanges
 - Difficulty verifying the ultimate source of funds
- These risks may facilitate ML/TF activities if not mitigated.

5. Risk Mitigation Measures

A2F B.V. applies the following controls:

- Acceptance only via regulated and licensed Virtual Asset Service Providers (VASPs)
- Prohibition of privacy coins (e.g., Monero, Zcash) that prevent transaction traceability
- Use of blockchain analytics and wallet risk scoring for transaction monitoring
- Application of Enhanced Due Diligence (EDD) for high-value or high-risk transactions
- Transaction thresholds for additional verification procedures

6. Customer Due Diligence (CDD/EDD)

For all cryptocurrency transactions:

- Verification of wallet ownership is required
- Customers must provide source of funds and source of wealth where applicable
- Enhanced checks apply to PEPs, high-risk jurisdictions, or high-value transactions
- Ongoing monitoring ensures crypto activity is consistent with customer risk profiles

7. Transaction Monitoring and Reporting

A2F B.V. employs blockchain analytics tools to identify unusual or suspicious activity.

Red flags include:

- Structuring of transactions below reporting thresholds
- Rapid in-and-out conversions with no gaming activity
- Transactions linked to high-risk jurisdictions or sanctioned addresses
- Use of multiple wallets or third-party payments

Suspicious Transaction Reports (STRs) are filed with the Curaçao FIU where required.

8. Record Keeping

All cryptocurrency-related records are retained for a minimum of five (5) years, including:

- Wallet addresses used by customers
- Transaction hashes and timestamps
- Blockchain analysis reports
- KYC data collected at onboarding and during monitoring

9. Staff Training

All relevant staff receive mandatory training in cryptocurrency risk management. Training covers:

- AML/CTF obligations for virtual assets
- Identification of red flags and suspicious crypto activity
- Use of blockchain monitoring and analytics tools

Training is refreshed annually or upon major regulatory updates.

10. Policy Review and Updates

This policy is reviewed annually, or sooner if required due to emerging risks, regulatory changes, or new guidance from the CGA, FATF, or FIU. Updates will be documented and communicated to all relevant personnel.

11. Signature and Validation

Signed on behalf of A2F B.V.



Marcin Juliusz Wasik

Director

A2F B.V.

Date: 29 December 2025