

Newlinetec B.V.

Crypto Asset Policy

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Document Version Control

Newlinetec B.V. – Crypto Asset Policy	
VERSION CONTROL	
Current version	1.0
Effective Date	2025-10-17
Sign Off Date	2025-10-17
Document Owner	Compliance Officer
Next Review Date	2026-10-17
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	Creation of this document

Version history

Version	Date	Author	Purpose
1.0	2025-10-17	Newlinetec B.V.	Creation of this document

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1. Purpose & scope

This policy outlines the rules, procedures, and controls regarding the acceptance, use, and management of cryptocurrency assets (“crypto”) within Newlinetec B.V.’s gaming platform, ensuring compliance with applicable laws and international best practices. Being a remote gaming entity authorized under Curacao jurisdiction, Newlinetec B.V. is deemed to be carrying out “relevant financial business” in terms of the CGA’s AML/CFT/CFP Regulations and thus Newlinetec B.V. is a subject-person in terms of said Regulations. As such, it is required to abide by the applicable legislation and guidance relating to the prevention of money laundering and funding of terrorism.

2. Audience

This Policy applies to all employees, officers, directors, contractors, consultants, and any other individuals or entities acting on behalf of the Company, regardless of location or job function.

It is particularly relevant for individuals engaged in the following activities:

- Customer onboarding and due diligence
- Financial transactions and payment processing
- Compliance and risk management
- Legal and regulatory affairs Internal audit and controls

All personnel must understand their responsibilities under this policy and complete any required training provided by the Company. Failure to comply with the obligations outlined in this policy may result in disciplinary action, up to and including termination of employment or contract.

Third-party partners, agents, and service providers who represent or act on behalf of Newlinetec B.V. may also be required to comply with this policy, as determined by the nature of their relationship with the company.

3. Accepted cryptocurrencies

The Company currently accept the following cryptocurrencies:

- Bitcoin (BTC)
- Ethereum (ETH)
- Litecoin (LTC)
- USDT (Tether)

The list is subject to change at our discretion based on market conditions, risk assessments, or regulatory guidance.

4. Crypto payments

4.1 Compliance with regulatory requirements

Newlinetec B.V. is committed to ensuring compliance with all applicable regulations governing Virtual Financial Assets (VFAs). 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 Curacao Gaming Authority. 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).

4.2 Risks with crypto payments

Cryptocurrency is 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, Newlinetec B.V. is aware of its potential risks and do its best to mitigate them.

4.3 Unhosted wallets

Unhosted 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 unhosted wallets is paramount for regulatory compliance and mitigating risks associated with Money Laundering (ML) and Terrorist Financing (TF). Newlinetec B.V. will ensure that customers utilizing unhosted 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 unhosted wallet owners, in line with established AML & CFT standards. Any unusual activity or transactions that raise concerns regarding the source or destination of funds will be promptly reported.

4.4 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 customers 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.

4.5 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 customers 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 customers acknowledge and accept the inherent risks associated with such volatility. Customers are strongly encouraged to exercise caution and to consider these risks when making deposits, withdrawals, or any other financial transactions involving VFAs. All customers acknowledge that due to the risks associated with the volatility of the value of VFAs relative to fiat currencies, that they may deposit or withdraw a sum which is higher or lower in value when compared to fiat currencies than anticipated.

4.6 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 refunded & sufficient gameplay is reached.

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

4.7 Delisting of crypto assets

In cases where a supported cryptocurrency is delisted or experiences extreme volatility, deposits and withdrawals may be temporarily or permanently disabled. Customers will be notified in advance, when feasible, and may be required to withdraw such assets within a specific timeframe.

5. Deposits and Withdrawals

5.1 General terms

All cryptocurrency transactions are subject to verification and approval by the Company, in accordance with AML/CFT obligations, risk controls, and operational policies. Deposits and withdrawals are processed exclusively through wallet addresses provided or authorized by Newlinetec B.V. and must not involve third-party intermediaries.

5.2 Deposits

5.2.1 *Deposit instructions*

Each customer is assigned a unique wallet address for each supported cryptocurrency. Customers must send funds only to the correct and currently active deposit address listed in their account. Sending unsupported cryptocurrencies, tokens on incorrect chains, or funds to expired or incorrect addresses may result in permanent loss of funds. Newlinetec B.V. assumes no responsibility in such cases.

5.2.2 *Minimum deposit amount*

Deposits below the minimum threshold may not be credited and are non-refundable due to network fees and processing constraints. These thresholds are clearly stated in the deposit section of the platform.

5.2.3 *Use of privacy tools*

The use of coin mixers, tumblers, or privacy wallets (e.g., Wasabi, Tornado Cash) is strictly prohibited. Any transaction suspected of using obfuscation techniques will be flagged and reported to relevant authorities.

5.3 Withdrawals

5.3.1 *KYC requirements*

No withdrawals will be processed unless the customer has completed the full Know Your Customer (KYC) verification process, including document upload and facial identity verification, in line with Curacao Gaming Authority's compliance standards.

5.3.2 *Withdrawal approval*

All withdrawal requests are subject to review and may be delayed if:

- the account has engaged in unusual activity; and
- the withdrawal amount exceeds daily/monthly limits.

Additional verification or enhanced due diligence (EDD) is required.

5.3.3 *Processing times*

Withdrawals are typically processed within 48 hours, but processing may be extended due to blockchain congestion, compliance checks, or technical issues. Customer will be notified in case of significant delays.

5.3.4 *Incorrect wallet address*

It is the customer's responsibility to ensure the accuracy of the withdrawal wallet address. Newlinetec B.V. will not reimburse funds sent to an incorrect or incompatible address due to customer error.

5.3.5 *Withdrawal limits*

Default limits apply unless otherwise stated or requested by the customer (after verification):

- Daily withdrawal cap: e.g., EUR5,000 in crypto equivalent
- Monthly withdrawal cap: e.g., EUR 10,000 in crypto equivalent

Higher limits may be granted based on risk profile and source of funds verification.

5.3.6 *Suspicious withdrawals*

Any withdrawal deemed suspicious or involving a flagged wallet address will be immediately paused, and the account will be investigated. The Company reserve the right to block, reverse, or freeze transactions in compliance with legal obligations.

5.4 Reversals and refunds

Cryptocurrency transactions are irreversible. The Company does not offer refunds on successful crypto transactions. In cases of technical or administrative errors (e.g., duplicate processing), customers may contact customer support for manual review.

5.5 Asset conversion

Customers may convert deposited cryptocurrencies into fiat balances (or other supported cryptos) using live exchange rates. All conversions are final and subject to applicable fees, spreads, and limits as disclosed in the platform's fee schedule.

6. Taxation and legal liability

Newlinetec B.V. does not provide tax advice. It is the sole responsibility of customers to determine and fulfill their tax obligations related to the use of cryptocurrencies, including but not limited to:

- Winnings derived from gameplay or promotions;
- Capital gains or losses from cryptocurrency value fluctuations; and
- Income received in the form of bonuses, rewards, or referral programs.

Customers must comply with the tax laws and regulations applicable in their country of residence, citizenship, or tax domicile. Customers are encouraged to keep their own detailed records of all cryptocurrency transactions conducted on the Company's platform, including:

- Dates and times of transactions;
- Crypto amounts sent and received;
- Equivalent fiat values at the time of each transaction; and
- Relevant wallet addresses and transaction IDs.

We may provide limited transaction history upon request, but do not guarantee comprehensive archival access beyond our statutory retention obligations.

Signatory page

Director

Director

Compliance Officer

Date: