

Crypto Risk & Usage Policy

DragonMoney N.V.

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1. Purpose

This Policy establishes the framework and internal standards under which the Company accepts, processes, and monitors cryptocurrency transactions. It identifies the risks associated with the use of cryptocurrencies for deposits and withdrawals, defines the measures taken to mitigate those risks, and ensures compliance with the laws and regulations of Curaçao, including the oversight of the Curaçao Gaming Authority (CGA) and the requirements of the Landsverordening op de Kansspelen (LOK). This Policy applies both to internal operations and to external communications with players.

2. Scope

The Policy applies to all cryptocurrency transactions conducted by players on the Company's platform, including deposits, withdrawals, and the monitoring of related activities. It covers the operational, compliance, and record-keeping processes applied by the Company in relation to cryptocurrencies.

3. Accepted and Prohibited Tokens

3.1 The Company accepts only liquid and widely traded cryptocurrencies. Accepted cryptocurrencies include, but are not limited to: USDT (TRC20/ERC20), USDC, Bitcoin (BTC), and Ethereum (ETH). The acceptance list may be updated periodically based on market conditions, liquidity, and regulatory requirements.

3.2 The Company expressly prohibits the use of privacy-enhancing or illiquid cryptocurrencies. Examples of prohibited tokens include Monero (XMR), Zcash (ZEC), or any low-capitalization assets that may compromise AML/CTF standards.

3.3 The Company reserves the right to reject or suspend transactions involving unsupported tokens at its sole discretion. Such transactions may not be recoverable and players remain solely responsible for any loss.

4. AML/CTF Compliance

4.1 All cryptocurrency transactions are subject to Customer Due Diligence (CDD). Players must undergo KYC verification to establish identity and verify the legitimacy of funds before engaging in significant cryptocurrency activity.

4.2 Enhanced Due Diligence (EDD) is applied to transactions equal to or exceeding 5,000 NAF (approximately USD 2,800). Additional documentation may be requested, such as proof of source of funds, transactional history, or supporting bank/exchange records. These cases may also be reported to competent authorities as required by law.

4.3 The Company prohibits cryptocurrency deposits or withdrawals originating from or passing through mixing services, tumblers, anonymity-enhancing technologies, chain-hopping services, or other methods designed to conceal the origin of funds.

4.4 The Company continuously monitors cryptocurrency transactions using automated and manual tools designed to detect unusual patterns, structuring attempts, or indicators of money laundering or terrorist financing.

5. Sanctions Screening

The Company conducts sanctions screening on both clients and all crypto tokens accepted by the Company. Any wallet address, token, or transaction associated with jurisdictions, entities, or individuals subject to international sanctions (UN, EU, OFAC, UK HMT) shall be rejected and reported to the competent authorities in accordance with applicable laws and CGA requirements.

6. Responsible Gaming Applicability

The Company confirms that all Responsible Gaming rules and procedures are equally applicable to players who use cryptocurrencies for deposits or withdrawals. No distinction is made between fiat and crypto users in the implementation of self-exclusion, cooling-off, or other responsible gaming measures.

7. Segregated and Cold Storage Wallets

DragonMoney N.V. applies wallet segregation practices, separating operational, customer, and reserve funds. In addition, the Company maintains cold storage wallets for the majority of crypto holdings to ensure enhanced security, minimize risk of loss, and comply with best practices recommended by the Curaçao Gaming Authority.

8. Operational Rules

8.1 The Company is not a currency exchange provider and does not facilitate the conversion of fiat to crypto or crypto to fiat. Players are solely responsible for carrying out such conversions through licensed third-party providers.

8.2 Deposits and withdrawals are accepted only from wallets registered and controlled by the player. Withdrawals are returned exclusively to the originating wallet address to reduce the risk of third-party interference.

8.3 Cryptocurrency deposits are credited only after the required number of blockchain confirmations has been received. Confirmation thresholds may vary depending on the network conditions and security requirements.

8.4 Blockchain transaction fees are borne entirely by the player. The Company has no control over such fees and does not reimburse players for network costs.

9. Record-Keeping

9.1 The Company maintains detailed records of all cryptocurrency transactions, including wallet addresses, transaction hashes, transaction amounts, timestamps, and any related due diligence documentation.

9.2 Such records are securely stored and retained for a minimum of five (5) years, or longer where required by law or regulation. Access to records is restricted to authorized personnel only.

10. Player Responsibilities

10.1 Players are responsible for ensuring that they only use accepted cryptocurrencies and valid wallet addresses. Transactions made with unsupported tokens or invalid wallet information may result in permanent loss of funds.

10.2 Players must not use mixing services, tumblers, or other anonymity-enhancing tools in connection with transactions on the platform.

10.3 Players are responsible for safeguarding private keys, wallet access information, and related credentials. The Company accepts no liability for losses caused by poor security practices on the part of players.

11. Disclaimer

The Company accepts no responsibility for losses caused by market volatility, mistaken transfers, failed transactions, network congestion, or failures of third-party wallets or exchanges. By depositing or withdrawing funds in cryptocurrency, players acknowledge and accept the risks described in this Policy. The use of cryptocurrency is optional, and alternative payment methods may be available to players.

12. Approval and Review

This Policy has been reviewed and approved by the Compliance Department and the Board of Directors. It will be reviewed annually, or more frequently if required by changes in law, regulations, or the operational environment.