RISK POLICY FOR CRYPTOCURRENCY USAGE

Owner: Bluewave Interactive N.V.
Game Licensed Provider for **Slott**

Prepared by: Compliance Team
Reviewed and Approved by: Legal Team
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Contents Overview

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1. Purpose

This policy establishes a robust regulatory, compliance, and risk management framework governing cryptocurrency **transactions** within **Slott**, an online gaming brand operated by **Bluewave Interactive N.V.** It ensures **compliance with Curaçao Gaming Control Board (GCB) regulations**, **mitigates risks such as fraud, money laundering and illicit financial activities**, and **safeguards both the company and players** against financial and reputational threats

2. Scope

This policy applies to all cryptocurrency transactions conducted on **Slott's gaming platform**, including:

- **Deposits and withdrawals** in cryptocurrency.
- **Crypto-to-fiat conversions** via third-party payment processors.
- **Internal fund transfers between players** (if applicable).
- **Third-party crypto payment service providers**.

It applies to all **players, employees, and service providers** involved in crypto-related operations.

3. Regulatory & Licensing Compliance

3.1

Bluewave Interactive N.V. adheres strictly to Curaçao's AML/CFT regulations for digital assets. Compliance measures include:

- **Enhanced Due Diligence (EDD)** for flagged transactions, requiring additional verification (e.g., Source of Funds or Wealth).
- **Mandatory reporting** to Curaçao's Financial Intelligence Unit (FIU) within 24 hours upon detection of suspicious activity.
- **Immediate account restrictions**, including temporary freezing of accounts linked to high-risk transactions until a resolution is reached.
- **Real-time transaction monitoring** using industry-standard tools (e.g., Chainalysis, Elliptic) to identify potential illicit activities.

Non-compliance with these regulations may result in severe penalties, including fines, license suspension, and legal action.

3.2 Geo-Restrictions & Jurisdictional Compliance

As a **Curaçao-licensed operator**, Bluewave Interactive N.V. ensures compliance with jurisdictional restrictions by:

- Implementing **IP geolocation tools** to block access from restricted jurisdictions.
- Verifying user identity and address through KYC checks to confirm jurisdiction.
- Collaborating with payment processors to enforce restrictions on transactions from banned regions.

Restricted jurisdictions include:

- United States
- United Kingdom
- China
- Australia
- France
- Netherlands
- Belgium
- Singapore
- Germany (unless licensed at state level)
- Canada (Ontario and other restricted provinces)

Players attempting to bypass geo-restrictions using VPNs, proxy services, or falsified information will face account suspension and potential legal action.

4. Risk Management Framework

4.1 Withdrawal & Deposit Thresholds

To maintain transparency and fairness, while mitigating risks associated with money laundering and fraud, the following limits apply:

Transaction Type	Minimum Amount	Maximum Amount (Per Day)	Maximum Amount (Per Month)
Crypto Deposit	€20 equivalent	€1,000 equivalent	€10,000 equivalent
Crypto Withdrawal	€50 equivalent	€1,000 equivalent	€10,000 equivalent

- High-risk transactions (e.g., repeated high-value deposits and withdrawals within short timeframes) will trigger **EDD**.
- **Enhanced Due Diligence (EDD)** applies to transactions exceeding the equivalent of **NAf. 4,000** (approx. €2,000).
- **Automated anomaly detection** to identify structuring or layering activities.

5. Player Communication Strategy for Crypto Transactions

5.1 Terms & Conditions (T&Cs) for Crypto Users

Players engaging in cryptocurrency transactions must accept and comply with the following T&Cs:

5.1.1 Eligibility & Compliance

- Players must be **at least 18 years old** or meet the legal gambling age in their jurisdiction.
- Crypto deposits and withdrawals are **not available** to players in restricted jurisdictions (see Section 3.2).

5.1.2 Deposit & Withdrawal Rules

- Deposits must originate from **personal wallets only** (no third-party transactions allowed).
- Withdrawals must be processed to **the same wallet used for deposits** unless the player provides verified alternative wallet details.
- Transactions exceeding **NAf. 4,000 (€2,000)** require Source of Funds verification.

5.1.3 Transaction Processing Times

- **Crypto deposits** are processed instantly, but may take up to 30 minutes depending on network congestion.
- **Crypto withdrawals** are processed within **24-48 hours** after verification.

5.1.4 Fraud Prevention & Monitoring

- Bluewave Interactive N.V. reserves the right to **review, hold or reject transactions** flagged for suspicious activity.
- Any attempt to **abuse promotions or bonuses using cryptocurrency** may result in **account suspension**.

5.1.5 Volatility & Exchange Rate Disclaimer

- Crypto deposits are **converted to EUR/USD at the current exchange rate**

Withdrawals are subject to exchange rate fluctuations, and BlueWave Interactive N.V. is not liable for any valuation changes.

5.1.6 Dispute Resolution

- Players experiencing issues with crypto transactions must contact **customer support** within 48 hours.
- If a dispute arises, **Bluewave Interactive N.V.'s** compliance team will investigate and provide a resolution within five (5) business days**.**

5.1.7 Player Risk Warning – Cryptocurrency Volatility

Players should be aware that **cryptocurrency values fluctuate significantly** due to market volatility.

- Players must provide **explicit acknowledgment of risks** before proceeding with transactions.

6. Ongoing Compliance Monitoring & Training

- **Mandatory staff training** on cryptocurrency risks, fraud detection, and AML/CFT best practices conducted **biannually**.
- Continuous updates of **transaction monitoring tools** and **risk-scoring algorithms** to address emerging threats.
- **Internal and third-party audits** to assess compliance with policy and regulatory updates.
- A **compliance dashboard** to track training completion, transaction anomalies, and regulatory adherence.

7. Conclusion

This policy represents Bluewave Interactive N.V.'s commitment to establishing a secure and compliant ecosystem for cryptocurrency transactions. By adhering to Curacao Gaming Control Board (GCB) regulations and implementing robust measures to detect and prevent financial crimes, Bluewave ensures:

- A transparent and fair gaming environment for players.
- Full Compliance with Curaçao's AML/CFT obligations and international regulatory standards.
- Continuous improvement in fraud detection,risk management practices, and operational security.

Through ongoing investment in staff training, cutting-edge compliance technology, and regulatory best practices, BlueWave Interactive N.V. reaffirms its **commitment to integrity and trustworthiness** in the global gaming market.