

Online Casino Crazybet

**BUSINESS PLAN
INBOTLER B.V.**

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1 SUMMARY OF KEY POINTS

1.1 Project objectives

The initiative includes establishing a company that provides online gaming services, and the website is currently in the process of being developed. The domain is Crazybet.bet

Company Description:

Enter the realm of Crazybet, an online gaming enterprise that goes beyond limits to deliver an engaging and responsible gaming journey. We epitomize innovation, integrity, and exhilaration in the ever-evolving realm of digital gaming.

Vision:

At Crazybet, we aspire to cultivate a worldwide gaming community where each player experiences empowerment, entertainment, and security. Our vision is to revolutionize the gaming sector by championing innovation, embracing responsibility, and establishing an inclusive environment for players of diverse backgrounds.

Mission:

At Crazybet, our mission is driven by the following principles:

- **Innovation Hub:** We are dedicated to propelling technological advancements and pushing creative boundaries to deliver an unparalleled gaming experience through a diverse range of cutting-edge games.
- **Responsible Gaming Advocacy:** We take a proactive approach to responsible gaming by implementing robust player protection measures, investing in educational resources, and collaborating with organizations dedicated to promoting healthy gaming habits.
- **Player-Centric Focus:** Our commitment lies in placing our players at the core of everything we do. This involves offering personalized experiences, responsive customer support, and a dedication to continuously enhancing our offerings based on player feedback.
- **Global Connectivity:** We aim to break down geographical barriers, creating a global gaming network that welcomes players from diverse cultures, backgrounds, and regions.

Goals:

- **Exemplary Entertainment:** We strive for excellence in every facet of entertainment, ensuring that our games not only offer excitement but also serve as platforms for social interaction, skill development, and unforgettable experiences.
- **Innovative Leadership:** Our ambition is to lead in industry innovation, establishing new benchmarks for gaming excellence and consistently surprising our players with fresh and engaging gaming experiences.

- **Community Engagement:** We aim to create a positive impact on the community by contributing to charitable causes, supporting local initiatives, and promoting responsible gaming as a fundamental aspect of our corporate social responsibility.
- **Sustainable Development:** We are committed to achieving sustainable growth by harmonizing financial success with ethical business practices, environmental responsibility, and a dedication to the well-being of our players.

Upcoming regulatory authority commencing operations in 2024: Gaming Control Board. The process of obtaining the government license is presently in progress.



The domain is Crazybet.bet, held and operated by a Curacao company INBOTLER B.V.

The screenshot shows the Safenames International Domain Portal interface. The top navigation bar includes links for Home, WHOIS, Help, and Logout. The account information at the top indicates the user is logged in as INBOTLER B.V. with a security level of 1 and a cashpot balance of €0.00. The main content area is titled 'My Domain Names' and shows 1 domain name found matching 'crazybet.bet'. Below this, there is a table with columns for Domain Name, TLD, Account / Sub Account, Registration Term, Registered Date, Renewal Date, and Invoice Info. The table contains one entry for crazybet.bet, registered on 18.04.2023 and renewing on 18.04.2024. The sidebar on the left contains a Site Map with links for Account, Domain Management, and DNS & Transfers. The right sidebar contains a Global Domain Search bar and a Search & Order section with links for Search & Order Wizard, Fast Track Search & Order, Order IDN Domains, and Order SSL Certificates.

Domain Name	TLD	Account / Sub Account	Registration Term	Registered Date	Renewal Date	Invoice Info
crazybet.bet	bet	INBOTLER B.V.	1 yr	18.04.2023	18.04.2024	View (1) Invoices

1.2 Ubo Background

Serhii Burymskyi brings a wealth of experience across various roles, notably as a Marketing Specialist at LLC Slotoking, where he elevated brand awareness and engagement through digital channels, conducted market research to identify new opportunities, and collaborated with cross-functional teams to drive growth. Prior to this, as a Market Research Analyst at LLC Favorit Sport, he managed and executed comprehensive market research studies, ensuring data accuracy and preparing consultative reports. With a background as a Betting Manager and Betting Shop Cashier at the same company, Serhii has honed his skills in customer service, team management, and product coordination, contributing to his well-rounded expertise in the gambling industry.

Having previously served as a Marketing Specialist at LLC Slotoking, Serhii possesses extensive insight into the project's intricacies, providing her with a distinct advantage in steering the company towards success in her role as CEO.

Burymskyi Serhii

Professional Summary

Advertising Professional proffering exceptional promotion strategy and campaign coordination background. Notable for expanding market share through specialised advertising strategies. Expert consumer preference tracker for targeted marketing efforts.

Committed Marketing Professional with broad market research and analysis background. Triggered significant increase in customer traffic to company websites and shopping outlets from promotional activities. Exceptional consumer engagement and product promotion specialist.

Results-orientated individual dedicated to creating memorable multi-channel marketing campaigns that deliver brand recognition.

Uses data-driven approach to secure consistent high results.

Results-focused employee with experience developing motivated, dependable teams.

Communicates and delegates effectively to aid timely, quality completion of projects.

Experience

Marketing Specialist, LLC Slotoking

Feb 2022 - Dec 2023, Kryvyi Rih

- Increased brand awareness and customer engagement using digital channels.
- Conducted market research and analysed trends to identify new marketing opportunities.
- Analysed performance and efficiency of campaigns, using data to inform future strategy and reduce cost.
- Provided up-to-date accurate market information by identifying and researching competition.
- Collaborated with product and sales teams to develop strategic marketing initiatives, driving growth and improving sales.
- Developed and implemented marketing programs including events as well as email, social media and digital campaigns.
- Maintained company social media presence and coordinated a

Contact

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burymskyi.serhii@outlook.com

Ukraine, 50000, region Dnipropetrovsk, city Kryvyi Rih, street Ukhtomskoho, building 26, flat 69

50000

Skills

Joomla

B2B sales and negotiation

Marketo

Multi-channel strategy

SEO strategies

Google Analytics

Brand development

Digital and social media marketing

Data analytics

Market research

Client communication

Sales and marketing strategy

Leadership

Language

Ukrainian, Native

Russian, Native

English, Intermediate (B1)

1.3 Games

Primary Categories of Casino Games:

Type 1 – Games of Chance (RNG-based games such as slots and casino table games)

Type 2 – Betting (including live betting and virtual-sports betting)

Type 3 – Live Dealer Games

Type 4 – Pooled-prize games (such as lotteries and parimutuel)

Type 5: Promoting peer-to-peer games (such as sport-exchange, bingo and poker)

1.4 Project Indicators

The economic feasibility of the project has been confirmed through the computation of conventional financial indicators typically utilized in project analysis.

The project's evaluation timeframe encompasses 36 months (3 years), comprising an investment period of 3 months (0.3 years) preceding the project launch. Following the launch, the operational phase of the project extends for 33 months (2.7 years).

Table 1. Indicators of the project

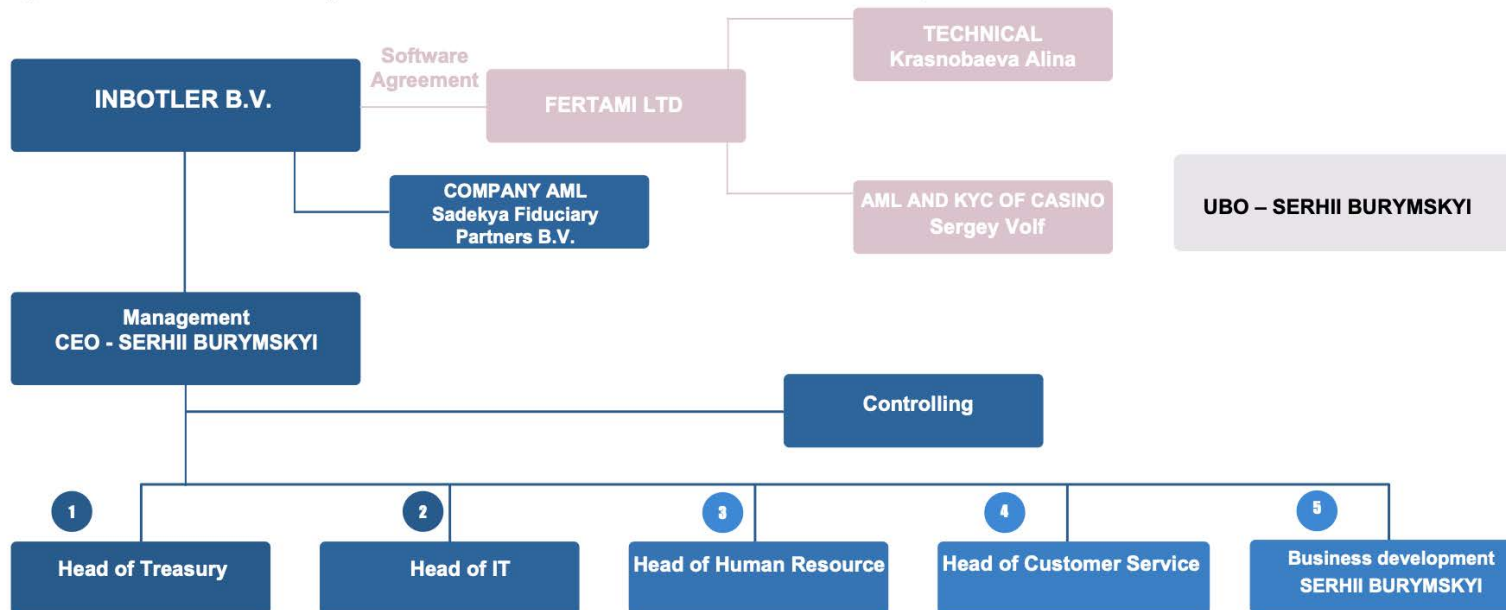
Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	153 198
Sum of proceeds (SP), EUR	5 221 530
Net average operational receipts per month (NAOR), EUR	44 440
Net profit for the project period, EUR	1 335 022
Average profitability for the project period (net profit to proceeds	25,57%
Discounting rate (DR), %	19,10%
Net present value (NPV), EUR	735 307
Average Rate of Return of investments (ARR)	209,95%
Return on investment (ROI)	771%
Profitability index (PI)	4,8
Internal rate of return (IRR)	134,12%
Pay back period of the project in whole (PBP), incl. financing scheme	16 months
	1,3 years

2 COMPANY MANAGEMENT STRUCTURE

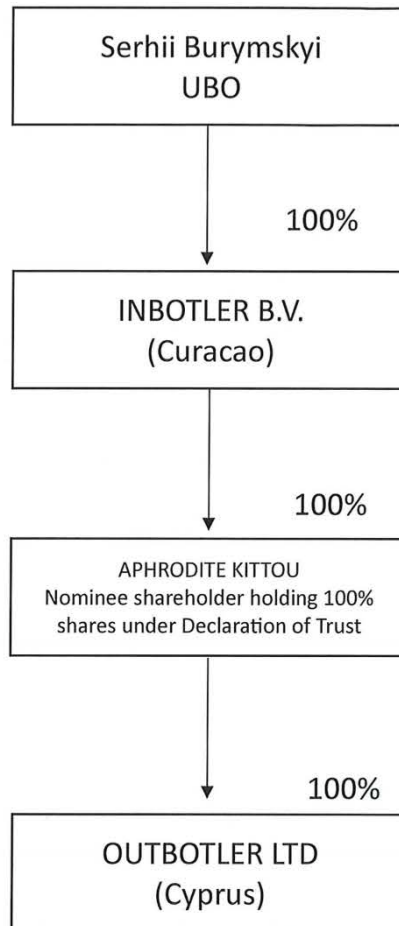
As both CEO and sole shareholder, the Ultimate Beneficial Owner (UBO) diligently oversees daily business operations. This involves supervising marketing initiatives, devising growth strategies across multiple sectors, integrating payment solutions, and extending the brand into new markets. Board meetings may involve key personnel in addition to the director. Decision-making is decentralized, with strategies and responsibilities directly delegated to departments and functions, promoting flexibility and preventing impasses. Legal support is handled internally by specialized departments and officers, with department heads primarily responsible for final decisions under the CEO's guidance.

Company control structure

INBOTLER B.V., a company incorporated under the laws of Curaçao with registration number 166326 and registered address at Abraham Mendez Chumaceiro Boulevard 03, Curacao



COMPANY STRUCTURE



3 SUMMARY OF FINANCIAL STATUS

3.1 Financial estimation for the first, second and third year

Table 2. Cash flow for the first year

	Total for 3 years	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25
Month of the project		1	2	3	4	5	6	7	8	9	10	11	12
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 153 198	- 139 800	-	-	- 13 398	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 139 800	- 139 800	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 11 310	-	-	-	- 11 310	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 088	-	-	-	- 2 088	-	-	-	-	-	-	-	-
Cash flow - OPERATING	1 417 227	- 4 850	-	-	-	- 42 162	1 708	4 896	8 045	11 596	15 638	- 25 571	18 907
Proceeds	5 221 530	-	-	-	-	34 080	41 577	47 057	52 889	59 416	66 769	75 063	81 408
Income from clients	5 221 530	-	-	-	-	34 080	41 577	47 057	52 889	59 416	66 769	75 063	81 408
Expenses total	- 3 804 303	- 4 850	-	-	-	- 76 241	- 39 869	- 42 161	- 44 844	- 47 819	- 51 131	- 100 634	- 62 501
Direct costs	- 2 918 266	- 4 850	-	-	-	- 65 016	- 28 644	- 30 276	- 32 070	- 34 044	- 36 215	- 45 409	- 46 663
Advertising costs	- 1 405 705	-	-	-	-	- 28 312	- 16 313	- 17 945	- 19 739	- 21 713	- 23 884	- 25 078	- 26 332
Additional staff costs	- 1 040 000	-	-	-	-	-	-	-	-	-	-	- 8 000	- 8 000

Table 3. Cash flow for the second year

	Total for 3 years	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26
Month of the project		13	14	15	16	17	18	19	20	21	22	23	24
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 153 198	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 139 800	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 11 310	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 088	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	1 417 227	23 445	28 537	34 239	39 808	18 680	41 415	45 114	42 684	40 419	48 035	13 329	52 981
Proceeds	5 221 530	88 542	96 453	105 214	113 879	120 765	127 220	133 727	140 464	147 505	159 312	168 961	178 049
Income from clients	5 221 530	88 542	96 453	105 214	113 879	120 765	127 220	133 727	140 464	147 505	159 312	168 961	178 049
Expenses total	- 3 804 303	- 65 097	- 67 916	- 70 976	- 74 071	- 102 085	- 85 805	- 88 613	- 97 780	- 107 086	- 111 277	- 155 632	- 125 068
Direct costs	- 2 918 266	- 47 980	- 49 362	- 50 814	- 52 338	- 86 311	- 63 619	- 65 383	- 75 236	- 85 181	- 87 224	- 97 368	- 99 620
Advertising costs	- 1 405 705	- 27 649	- 29 031	- 30 483	- 32 007	- 33 607	- 35 288	- 37 052	- 38 905	- 40 850	- 42 893	- 45 037	- 47 289
Additional staff costs	- 1 040 000	- 8 000	- 8 000	- 8 000	- 8 000	- 16 000	- 16 000	- 16 000	- 24 000	- 32 000	- 32 000	- 40 000	- 40 000
License fees	- 142 961	- 2 031	- 2 031	- 2 031	- 2 031	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 329 600	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300
Indirect costs	- 487 200	- 11 225	- 11 225	- 11 225	- 11 225	- 11 225	- 11 225	- 11 225	- 11 225	- 11 225	- 11 225	- 55 225	- 11 225
Accounting	- 126 667	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958

Office equipment maintenance	- 86 133	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692
Hosting	- 128 000	-	-	-	-	-	-	-	-	-	-	-	- 44 000	-
Office rent	- 50 400	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575
Legal support	- 96 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000
Taxes	- 398 837	- 5 893	- 7 329	- 8 937	- 10 508	- 4 548	- 10 961	- 12 004	- 11 319	- 10 680	- 12 828	- 3 039	- 14 223	- 14 223
Profit tax	- 398 837	- 5 893	- 7 329	- 8 937	- 10 508	- 4 548	- 10 961	- 12 004	- 11 319	- 10 680	- 12 828	- 3 039	- 14 223	- 14 223
Cash flow - FINANCING	- 245 616	-	- 9 094	- 11 090	- 13 039	- 5 644	- 13 602	- 14 896	- 14 046	- 13 253	- 15 919	- 3 771	- 17 650	- 17 650
Co-investor's investment	225 781	-	-	-	-	-	-	-	-	-	-	-	-	-
Refunds to co-investor	- 471 398	-	- 9 094	- 11 090	- 13 039	- 5 644	- 13 602	- 14 896	- 14 046	- 13 253	- 15 919	- 3 771	- 17 650	- 17 650

CASH FLOW OF THE PROJECT	1 018 413	23 445	19 443	23 149	26 769	13 035	27 813	30 218	28 638	27 166	32 116	9 557	35 331	
progressive total (cash balance)	1 018 413	84 234	103 677	126 826	153 595	166 630	194 444	224 661	253 300	280 466	312 582	322 140	357 471	

Table 4. Cash flow for the third year

	Total for 3 years	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27
Month of the project		25	26	27	28	29	30	31	32	33	34	35	36
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 153 198	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 139 800	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 11 310	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 088	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	1 417 227	61 048	61 498	67 810	71 228	60 326	80 756	92 399	96 021	105 337	106 057	83 308	114 547
Proceeds	5 221 530	190 756	201 815	212 515	227 634	240 903	253 741	271 836	287 807	303 245	315 835	330 521	346 572
Income from clients	5 221 530	190 756	201 815	212 515	227 634	240 903	253 741	271 836	287 807	303 245	315 835	330 521	346 572
Expenses total	- 3 804 303	- 129 708	- 140 318	- 144 705	- 156 406	- 180 578	- 172 985	- 179 437	- 191 786	- 197 907	- 209 778	- 247 213	- 232 024
Direct costs	- 2 918 266	- 101 985	- 112 467	- 115 074	- 125 811	- 153 058	- 139 703	- 142 871	- 154 198	- 157 692	- 169 360	- 173 211	- 189 211
Advertising costs	- 1 405 705	- 49 654	- 52 136	- 54 743	- 57 480	- 60 354	- 63 372	- 66 540	- 69 867	- 73 361	- 77 029	- 80 880	- 80 880
Additional staff costs	- 1 040 000	- 40 000	- 48 000	- 48 000	- 56 000	- 56 000	- 64 000	- 64 000	- 72 000	- 72 000	- 80 000	- 80 000	- 96 000
License fees	- 142 961	- 2 031	- 2 031	- 2 031	- 2 031	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 329 600	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300	- 10 300
Indirect costs	- 487 200	- 11 225	- 11 225	- 11 225	- 11 225	- 11 225	- 11 225	- 11 225	- 11 225	- 11 225	- 11 225	- 51 225	- 11 225
Accounting	- 126 667	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958	- 3 958
Office	- 86 133	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692	- 2 692

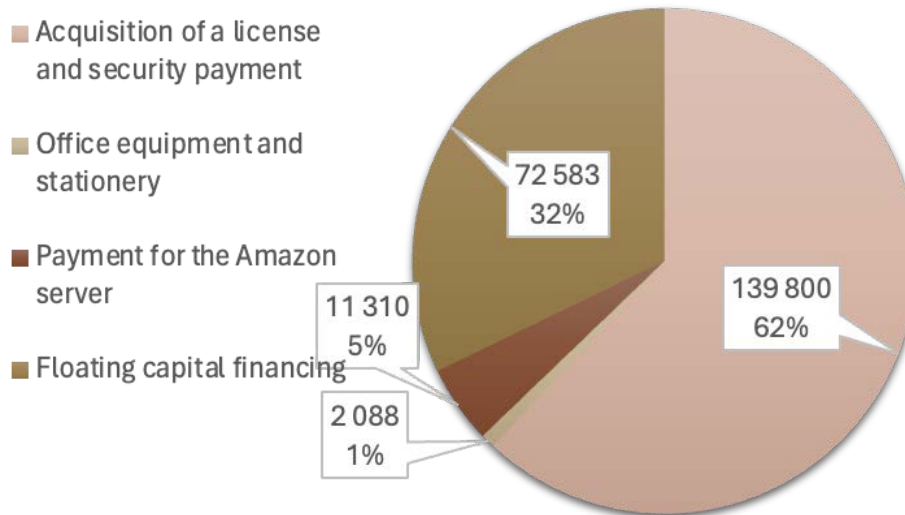
equipment maintenance														
Hosting	- 128 000	-	-	-	-	-	-	-	-	-	-	-	- 40 000	-
Office rent	- 50 400	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575	- 1 575
Legal support	- 96 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000
Taxes	- 398 837	- 16 498	- 16 625	- 18 406	- 19 370	- 16 295	- 22 057	- 25 341	- 26 363	- 28 990	- 29 193	- 22 777	- 31 588	- 31 588
Profit tax	- 398 837	- 16 498	- 16 625	- 18 406	- 19 370	- 16 295	- 22 057	- 25 341	- 26 363	- 28 990	- 29 193	- 22 777	- 31 588	- 31 588
Cash flow - FINANCING	- 245 616	- 20 473	- 20 631	- 22 840	- 24 036	- 20 220	- 27 371	- 31 446	- 32 714	- 35 974	- 36 226	- 28 264	- 39 198	- 39 198
Co-investor's investment	225 781	-	-	-	-	-	-	-	-	-	-	-	-	-
Refunds to co-investor	- 471 398	- 20 473	- 20 631	- 22 840	- 24 036	- 20 220	- 27 371	- 31 446	- 32 714	- 35 974	- 36 226	- 28 264	- 39 198	- 39 198

	-	-	-	-	-	-	-	-	-	-	-	-	-	-
CASH FLOW OF THE PROJECT	1 018 413	40 575	40 867	44 970	47 192	40 105	53 385	60 953	63 307	69 363	69 831	55 044	75 349	
progressive total (cash balance)	1 018 413	398 046	438 913	483 883	531 076	571 181	624 566	685 519	748 826	818 189	888 020	943 064	1 018 413	

3.2 Investment, expenses, funds

Type of initial investments - funds provided directly by the Ultimate Beneficial Owner.
Upon launch - profits generated directly from operations.

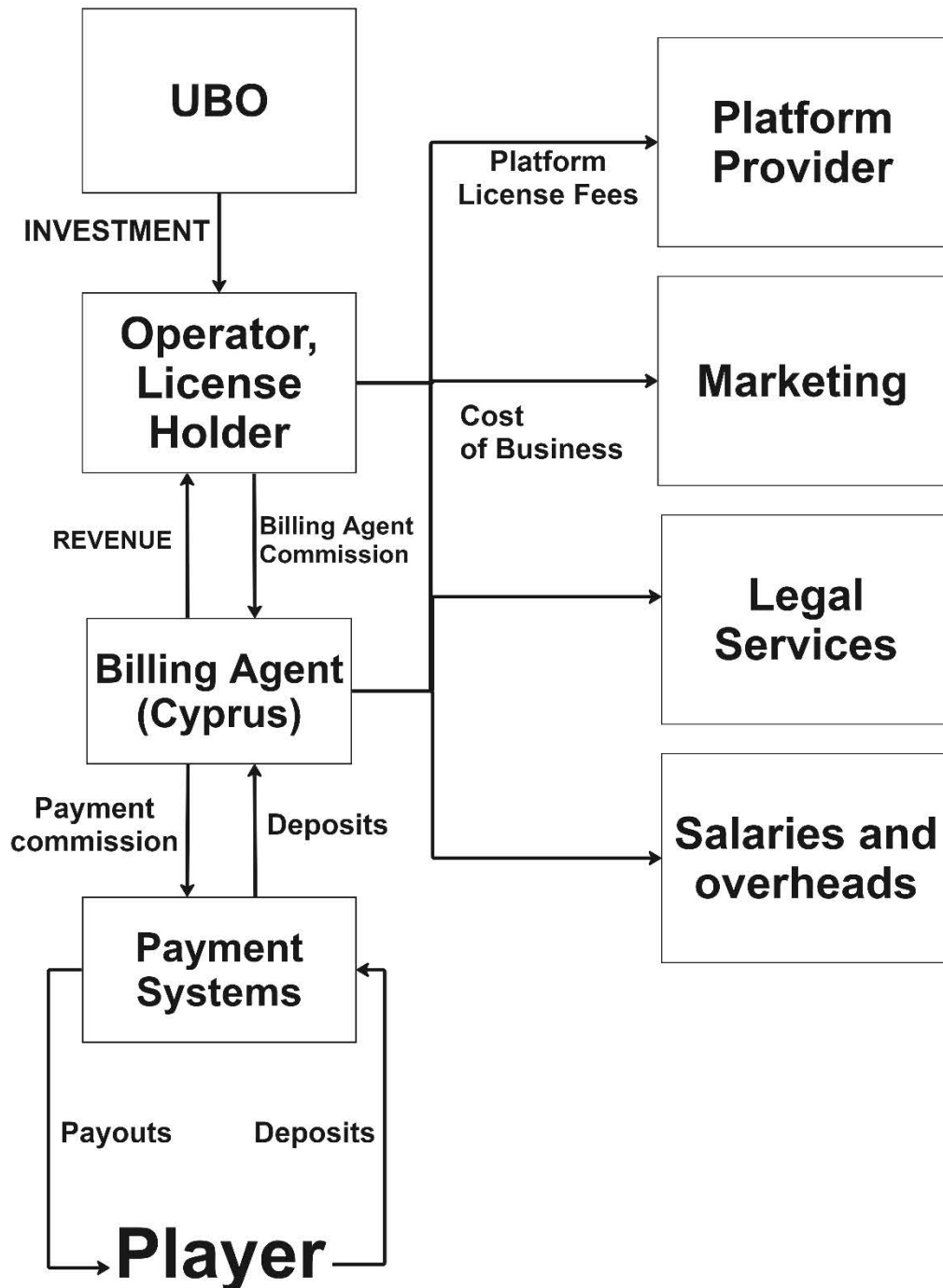
Diagram 1. Investments structure



3.3 Flow Of Funds

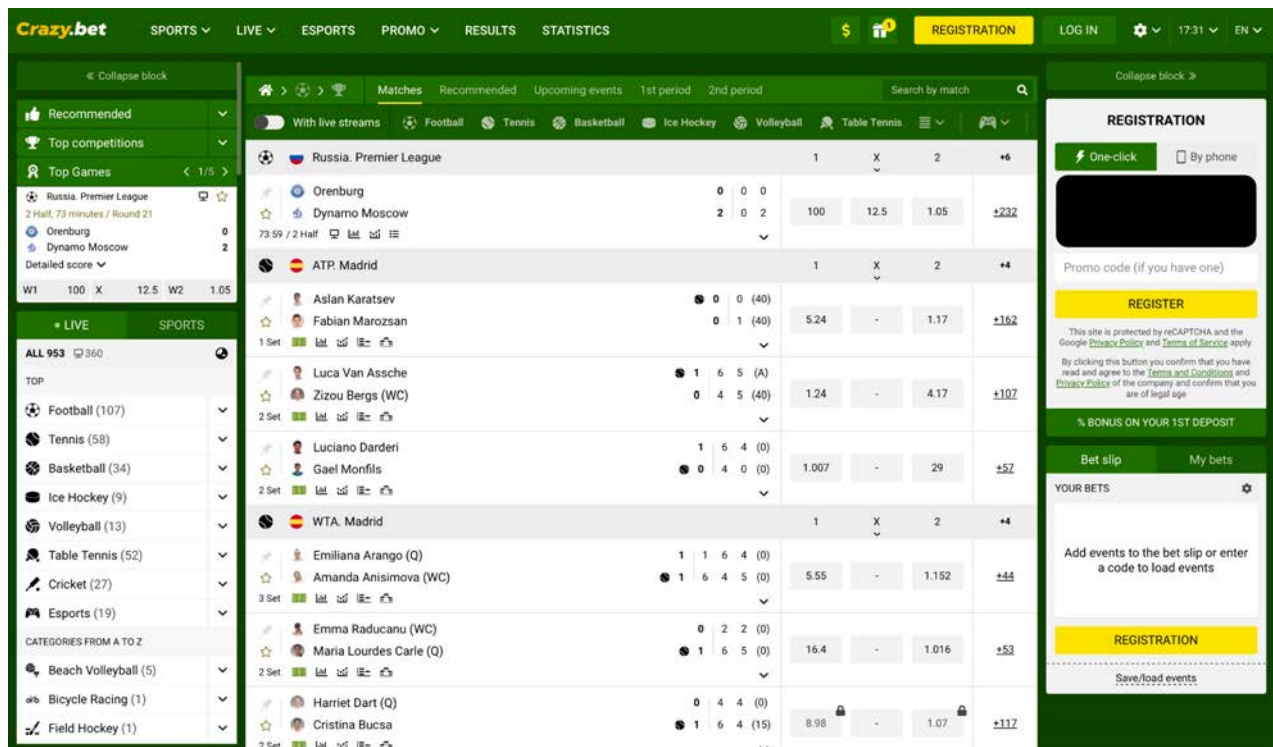
The cost of business for the project includes license fees to the Platform provider, Web-marketing, Service fees to employees and legal fees to fiduciary service providers.

Flow of Funds



4 PRODUCTS AND SERVICES

4.1 Registrations and opening of an account



REGISTRATION

 ONE-CLICK

 BY PHONE

 BY E-MAIL

 SOCIAL NETWORKS AND MESSENGERS

Select country 

Select currency 

Promo code (if you have one)

REGISTER

This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply.

By clicking this button you confirm that you have read and agree to the [Terms and Conditions](#) and [Privacy Policy](#) of the company and confirm that you are of legal age



THANKS FOR THE REGISTRATION!

Username:

Password:



Do not forget to save your username and password!

SAVE TO FILE

SAVE AS PICTURE

Enter e-mail

SEND TO E-MAIL

YOU'RE JUST ONE STEP AWAY FROM A BONUS

Get up to on your first deposit

MAKE A DEPOSIT

Crazy.bet SPORTS LIVE ESPORTS PROMO RESULTS STATISTICS MAKE A DEPOSIT 17:33 EN

Add email 1/5

Main account (AED) 0

ACCOUNT

- Deposit
- Withdraw funds
- Bet history
- Transaction history

EXTRA

- Promotions
- Customer Support

PROFILE

- Personal profile**
- Security
- Account settings
- Responsible Gambling

Log out

Personal profile

Fill in the empty fields to take advantage of the enhanced features of the website.

Fill in profile 34%

Account

Account number

Password

Registration date

Username

Personal info

Surname

Document number

First name

Document issue date

Date of birth

Country

Place of birth

Permanent registered address

Type of document

National identity card

Contacts

Phone

Email

ⓘ We recommend using Gmail to avoid any issues with receiving notifications

SAVE

This site is protected by reCAPTCHA and the Google Privacy Policy and Terms of Service apply.

4.2 Log in and Logout



Confirm action

Are you sure you want to log out?

LOG OUT

CANCEL

4.3 Terms and Conditions/ Rules and Procedures

Crazy.bet

SPORTS ▾LIVE ▾ESPORTS

PROMO ▾RESULTSSTATISTICS

\$

1

REGISTRATION

LOG IN



17:35 ▾

EN ▾

 About us

 Contacts

 **Terms and Conditions**

 Payments

 How to place a bet

 Cookie Policy

 Anti-Money Laundering

 KYC Policies

 Dispute resolution

 Responsible Gaming

 Self-exclusion

 Fairness & RNG Testing Methods

 Privacy & Management of Personal Data

 Accounts, Payouts & Bonuses

 Betting rules

 Risk warning

Search 

SHOW ALL

1. Terms and Conditions

2. Return/Refund Policy

3. Types of bets ▾

4. Live Betting

5. Match Results, Dates and Starting Times

6. Rules on sports ▾

7. Available Markets (Outcomes)

8. Extra bets

9. Examples ▾

10. Main sources of information

11. CALCULATION OF «ACCUMULATOR» AND «SYSTEM» BETS

1. Terms and Conditions

1. 1. Introduction

1.1. By using, visiting and/or accessing any part of the INBOTLER B.V. website and or any sub-domain, website or mobile application that we own or operate (the "Website") and/or registering an account on the Website you agree to be bound by these Terms and Conditions, our Privacy Policy, our Cookies Policy and any other rules applicable to our betting or gaming products available on the Website (together the "Terms"), and are deemed to have accepted and understood all the Terms.

1.2. You should read the Terms carefully, if you do not agree with them and/or cannot accept them, please do not use, visit or access the Website.

1.3. These Terms may be changed by us from time to time for any reason (including compliance with applicable legislation or requirements of regulators). Current version of the Terms will be available on the Website. If you continue to use the Website after such changes come into effect you are deemed to have accepted such changes to the Terms.

1.4. www.crazybet.bet -is operated by INBOTLER B.V., a company registered under the laws of Curacao under registration number 166326.

1.5. Reference to "you", "your", "customer", "user" or "player" shall mean any person using the Website or any services available thereon and/or any registered customer of the Website.

1.6. Reference to "games" shall mean Casino, Live Casino, Sportsbook, cards, and other games as may from time to time become available on the Website. INBOTLER B.V. reserves the right to add and remove Games from the Website at its own discretion.

2. Your Account

2.1. Legal requirements

2.1.1. Reference to the "Account" shall mean an account registered by you on the Website after accepting and agreeing to these Terms. By registering an Account you declare that you are over 18 years of age or of a higher minimum legal age as stipulated in the jurisdiction of your residence under the laws applicable to you. It is your sole responsibility to know whether the services available on the Website are legal in the country of your residence. Persons who are under age of 18 years are not allowed to use the Website and/or any services available on it.

2 1 2 You are not allowed to register on the Website and use our services if you are a resident of Aruba

4.4 Obligations as a player

2. GENERAL TERMS

1. In order to register for this website, the user is required to accept the General Terms and Conditions. In the event the General Terms and Conditions are updated, existing users may choose to discontinue using the products and services before the said update shall become effective, which is a minimum of two weeks after it has been announced. Remember that gambling can be addictive. Play responsibly.
2. Bets may only be placed by individuals who are 18 years of age or the age of majority in their state (if the age of majority is over 18) and agree to the Betting Rules offered by the bookmaker. The customer shall be held liable for violation of this regulation. By registering and playing on the website, you confirm that you do not suffer from a gambling addiction.
3. The following individuals are not allowed to place bets:
 - o individuals who are under 18 years of age at the time of placement;
 - o individuals who directly participate in the events being betted on (e.g. sportspeople, coaches, referees, club owners or club management, or other individuals who can influence the outcome of the event), as well as any individuals acting on their behalf or affiliating with them;

-
- o individuals representing other bookmakers;
 - o individuals who are prohibited from entering into a contract with a bookmaker subject to the effective legislation.
4. The right to access and/or use the Website (including any or all of the products offered through the Website) may be considered illegal in certain countries (including, for example, the USA, the United Kingdom, Cyprus, the Netherlands, etc.). We do not intend for our Website to be used for sports betting, gambling or other purposes by people who reside in countries or jurisdictions in which such types of activity are illegal. The list of explicitly forbidden territories is: Aruba, Australia, Bonaire, Curacao, France, Iran, Iraq, Netherlands, Saba, Spain, St Maarten, Statia, U.S.A or the U.S.A dependencies, United Kingdom.
 5. The fact that our Website is available in such a country and/or jurisdiction or that it can be displayed in the official language of any of those countries cannot be considered official authorization or legal grounds for using our Website and depositing funds into your account or withdrawing your winnings. The availability of the Website does not mean that it contains any proposals, incitement or invitation to use or subscribe to betting, gambling or any of the other services in any jurisdiction where such activity is illegal.
 6. You are responsible for determining whether your accessing and/or use of the Website is compliant with applicable laws in your jurisdiction and you warrant to us that gambling is legal in the territory where you reside. When opening an account and/or using our Website you must make sure that your actions are legal in the territory in which you reside. You also guarantee and agree that you have received legal advice before registering on our Website. If we become aware that you are a resident in a country where the use of our Website is considered illegal, we will have the right to close your account and refund any remaining balance on your account at the moment of its closure (after the deduction of any winnings credited after your most recent deposit was made).

4.5 Payouts

Crazy.betSPORTS ▾LIVE ▾ESPORTSPROMO ▾RESULTSSTATISTICS\$🎁1REGISTRATIONLOG IN⚙️17:36 ▾EN ▾

🔍

Search

SHOW ALL

Accounts, Payouts & Bonuses ^

1. Accounts

2. Deposits and Payouts

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👤 About us

📞 Contacts

📄 Terms and Conditions

💰 Payments

❓ How to place a bet

🔊 Cookie Policy

👤 Anti-Money Laundering

👤 KYC Policies

📄 Dispute resolution

🛡️ Responsible Gaming

👤 Self-exclusion

📄 Fairness & RNG Testing Methods

🛡️ Privacy & Management of Personal Data

💰 Accounts, Payouts & Bonuses

📄 Betting rules

👤 Risk warning

1. Accounts, Payouts & Bonuses

1. Accounts

1. Each registered customer is allowed to have only one account. Customers are allowed to register only one account per family, address, e-mail address, IP address, credit/debit card, e-wallet or electronic payment method. Persons otherwise associated with a customer will not be allowed to register on the website.

2. No registered customer is allowed to be re-registered as a new customer (under a new name, with a new email address, etc.).

3. In the event of duplicate registration (including registering under a new name), the submission of someone else's, invalid, or forged documents (including those that have been edited by using any kind of software or graphic editor)

multiple breaches of the Betting Company's T&C

doubts about the identity of the customer or the information they have provided (i.e. address, credit/debit card details, other data)

any types of fraud committed either by you or by another person acting in your interests or in collusion with you, including but not limited to:

- a) refund or rake fraud
- b) your use of a stolen or unverified bank card as a source of funds
- c) any actions you have carried out or attempted to carry out which may reasonably be considered illegal in any applicable jurisdiction, which were committed deliberately or with the intention to deceive and/or circumvent constraints set in law regardless of whether this action or attempt ultimately causes loss or damage to your account

when the customer placed the bet, they had information about the result of that event

the customer was able to influence the outcome of an event due to their direct participation in the match (sportspeople, coaches, referees, etc.) or because they acted on behalf of the participants

bets were placed by a group of bettors acting in concert (as a syndicate) in order to exceed the limits set by the bookmaker, as well as colluding with others in order to obtain an unfair advantage through bonus schemes or any other promotions offered by us

the bettor is suspected of using special software or hardware which facilitate automated betting

4.6 Withdrawing

Withdrawals can be made using the payment methods specified below, as follows: FIAT - provided that the deposit was made in FIAT and CRYPTO - provided that the deposit was made in cryptocurrency.

The screenshot displays the 'WITHDRAWING FROM ACCOUNT' page. On the left is a dark sidebar with navigation links: 'Add email', 'Bonus points 0', 'Main account (EUR) 0', 'ACCOUNT' (with sub-links 'Deposit' and 'Withdraw funds'), 'Bet history', 'Transaction history', 'EXTRA' (with sub-links 'Invite friends', 'VIP Cashback', 'Bonuses and gifts', 'Customer Support'), and 'PROFILE' (with sub-links 'Personal profile', 'Security', 'Account settings', 'Responsible Gambling'). A 'Log out' button is at the bottom of the sidebar.

The main content area is titled 'WITHDRAWING FROM ACCOUNT' and includes a red 'WITHDRAWAL REQUESTS' button. Below the title, it says 'Select payment method to withdraw money:'. A table on the left lists payment categories: 'ALL METHODS' (34), 'BANK CARDS' (2), and 'CRYPTOCURRENCY' (32). The 'BANK CARDS' section shows 'VISA' and 'MasterCard' options. The 'CRYPTOCURRENCY' section displays a grid of 20 cryptocurrencies: Bitcoin, Ethereum, TRON, Bitcoin Cash, Ethereum Classic, XRP, Litecoin, Dogecoin, Dash, Monero, ZCash, BitShares, DigiByte, Verge, QTUM, Stellar, Polkadot, Avalanche X-Chain, Tether on Ethereum, and USD Coin on Ethereum. A green chat bubble icon is in the bottom right corner.

Category	Count
ALL METHODS	34
BANK CARDS	2
CRYPTOCURRENCY	32

BANK CARDS	
VISA	MasterCard

CRYPTOCURRENCY				
Bitcoin	Ethereum	TRON	Bitcoin Cash	Ethereum Classic
XRP	Litecoin	Dogecoin	Dash	Monero
ZCash	BitShares	DigiByte	Verge	QTUM
Stellar	Polkadot	Avalanche X-Chain	Tether on Ethereum	USD Coin on Ethereum

4.7 Games List

The screenshot displays a casino game interface with a dark theme. At the top, a banner features a female mechanic character on the left, the word "GARAGE" in large, stylized orange letters in the center, and a Doberman Pinscher on the right. Below the banner, two circular icons show player statistics: "993 EUR You have won 3393*" and "2085 EUR You have won 7383*". A navigation bar includes icons for "All Games", "Favorites", "Lotteries", "Slots", "Climb to Victory", "Dice", and "Card Games", along with a search bar. The main area shows a grid of game thumbnails, each with a "MAX COEF" value and a "BEST" rating. The games listed are: Steampunk Kingdom (MAX COEF X180), Crash (MAX COEF X180), Crystal (MAX COEF X180), Lucky Wheel (MAX COEF X180), 21 (MAX COEF X2), Under and Over 7 (MAX COEF X5), Solitaire (MAX COEF X2), Scratch Card (MAX COEF X50), Vampire Curse (MAX COEF X252), and Apple Of Fortune (MAX COEF X336). On the right, a sidebar contains a "FAQ" section, an "EXTRA CASHBACK" section with a "Christmas Bonus" of 5%, and a "Select a game" section with a 3% cashback offer. A vertical menu on the far right includes icons for a gift, a number "7", a trophy, and a coin.

Garage

993 EUR You have won 3393*
2085 EUR You have won 7383*

All Games Favorites Lotteries Slots Climb to Victory Dice Card Games

Game search...

by popularity Alphabetically

MAX COEF X180 NEW
Steampunk Kingdom

MAX COEF X180
Crash BEST

MAX COEF X180 DEMO
Crystal BEST

MAX COEF X180 FREE
Lucky Wheel

MAX COEF X2
21 BEST

MAX COEF X5 DEMO
Under and Over 7 BEST

MAX COEF X2
Solitaire BEST

MAX COEF X50
Scratch Card BEST

MAX COEF X252
Vampire Curse

MAX COEF X336 DEMO
Apple Of Fortune BEST

Collapse block

FAQ

EXTRA CASHBACK until 31.12.2023

Christmas Bonus 5%

Select a game 3%

Select a game 3%

3% 5%

5 KEY SUPPLIERS, MATERIAL DEPENDENCIES

5.1 Platform Description

Fertami Ltd, a company registered under the laws of the Republic of Cyprus under registration number HE 413010 (“Fertami”) has developed the Unionsoft Platform (“**Platform**”) - a software solution for betting companies with 24/7 stream of data and technical support. The Platform provides betting website operators with a reliable software solution designed to deliver high performance and security. Built on advanced technologies, it offers a diverse range of features, including real-time data updates, support for multiple types of bets, huge selection of sports and flexible customization options.

1. Platform specifications

1.1. General specifications

1.1.1. The Platform’s structure

The functional structure of the Platform includes the following modules:

- a) the option to register as a customer
- b) the option to log in and reset the password
- c) the option to make deposits and withdrawals
- d) the option to place bets
- e) the option to view betting history
- f) the option to view deposit history
- g) the option to receive bonuses
- h) the option to view bonus history
- i) the option to contact the customer support team
- j) the option to self-exclude
- k) the option to place limits on deposits
- l) deployment of two-factor authentication
- m) deployment of secret phrase authentication
- n) databases and tables of real events containing established statistics or dynamic odds
- o) service for obtaining odds on events through an API
- p) service for tracking customer money – records of deposits, bets, and withdrawals
- q) service for integrating the Platform with the payment services of other third-party providers through an API
- r) service for notifying customers about a future event, changes, adverts, and marketing for promotions by email, text message and pop-up message on mobile devices
- s) tool for protecting and restricting access and assigning competences to Fertami’s employees (BackOffice) and displaying an employee’s level of access in their profile
- t) profiles for the technical service departments of remote operating units (B2C) including the department structure, information about the SLA and the serviced business units of the operator or affiliates
- u) technical support service including the systems for logging in, registration, and recording and resolving questions and problems from service contractors when using email services or live communication

- v) display of short messages to customers (primarily the status of their account and customer legal compliance)
- w) the option for customers to put forward and discuss customer ideas to improve the platform's services and install new services, and the option to introduce ratings
- x) document management – files received from customers – loading files and exchanging them with colleagues securely, tagging, the option to add comments and information about users that downloaded files, version control
- y) cookie service – storage and sharing of useful links to various online resources, customer recommendations and content on the basis of information accumulated about a customer, improvement and suggestions for customers to make using the platform easier and more efficient
- z) responsible gaming service – a service for customers to set up their own limits and self-exclude with the option to customize these to suit the different requirements of the various jurisdictions
- aa) Anti-fraud and AML service – the option to connect third-party resources through an API from government bodies in different jurisdictions to verify customers when they register and if they engage in suspicious activity
- bb) service for monitoring suspicious customer activity, such as using different payment methods and a large number of small deposits, bets, and withdrawals
- cc) voting service – the opportunity for customers to vote for the operator's various marketing or informational promotions posted and sent to customers through the Platform's services
- dd) service for issuing ratings – mechanisms for determining the activity and popularity of Platform users and creation of reports on VIP customers

2. Compatibility with related platforms

The Platform is compatible with third-party betting platforms and individual slots, casino, corporate back-office portal sufficient for general navigation and information research, a payment system aggregator, and a customer support module.

The Platform also supports:

- a) marketing modules from third parties
- b) integration with the business solutions including CMS, CRM, and BackOffice
- c) integration with external platforms such as Microsoft Office, business email, tasks and calendars, and a platform for sending mass messages by email and SMS
- d) integration with additional structures providing prior verification services on customers, KYC, AML, fraud prevention, and PEP lists to help the operator decide whether to accept certain users
- e) provision of API for several modules
- f) integration with system managing access to information resources for providing the betting odds.
- g) integration with AWS and other data storage services that have security certificates and are located within the EU.

Ergonomic features

It is possible to modify the Platform's interface according to the developed and agreed designs.

The Platform supports access from the following mobile platforms:

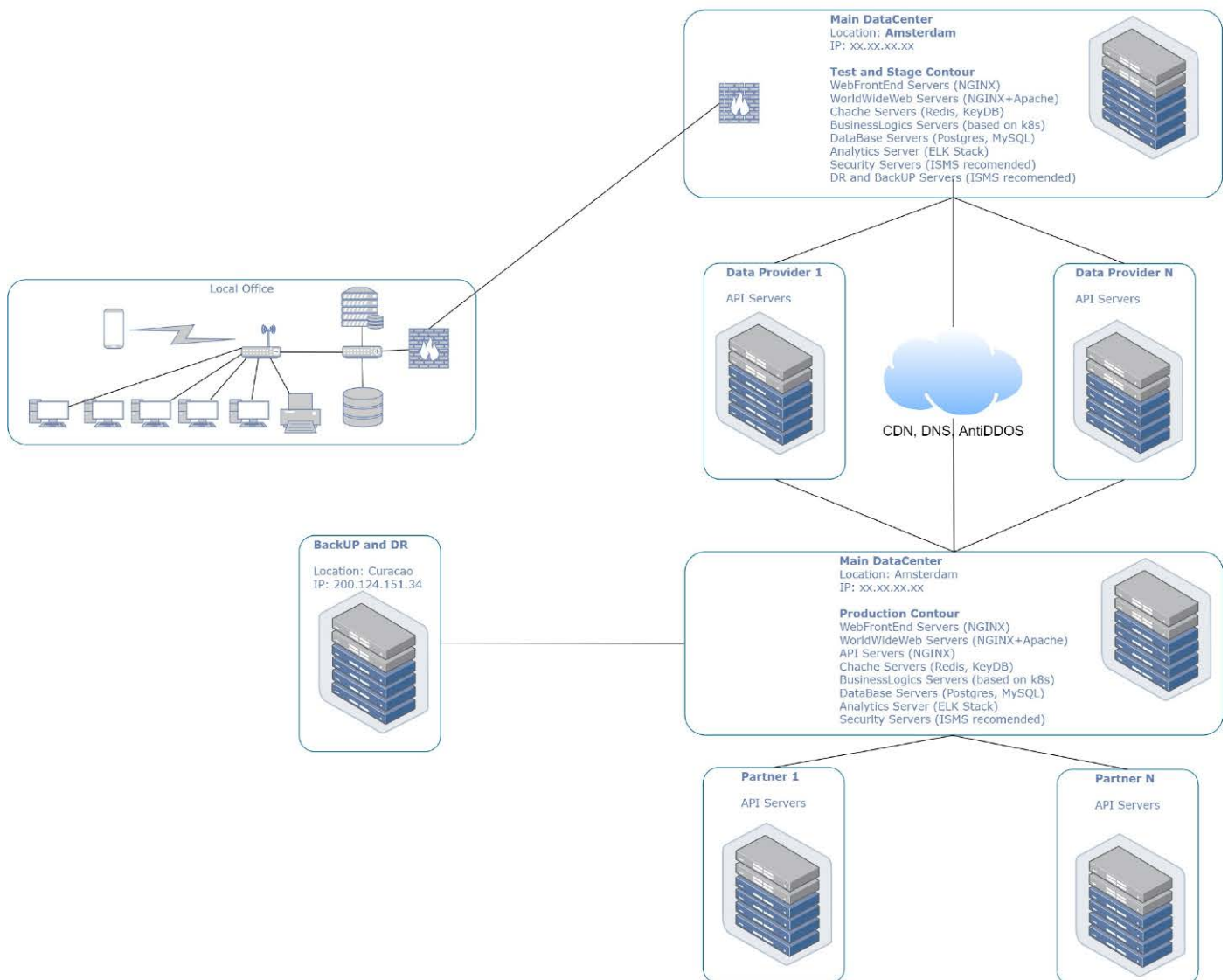
- a) iOS

- b) Android
- c) Windows

The Platform supports adaptive web design (or an adaptive user interface) capable of carrying out W3C CSS3 requests with a changing proportion grid and also support flexible changes to image proportions.

Platform Risks

With a robust disaster recovery plan and resilient infrastructure implemented, the platform's utilization entails minimal risks. Employing protocols for data backup and restoration, along with redundant server systems, effectively mitigates the risk of service disruptions and minimizes data loss. Ongoing testing and improvement of the disaster recovery plan are imperative to adapt to emerging threats and technological advancements, guaranteeing its effectiveness during critical situations. Collaboration with cybersecurity experts and regulatory bodies provides valuable insights and guidance, bolstering the disaster preparedness of online casino platforms and upholding operational security and customer confidence.



5.2 Payment Service Providers

Another vital group of suppliers includes payment service providers. Ensuring seamless payment processing is achieved by partnering with multiple trusted PSPs operating within the relevant jurisdictions. Payment service provider (at the connection/planning stage): Flutterwave, Paygames, Bigldea, Pion, RoyalPay, SticPay.



flutterwave



RoyalPay

Similarly, our strategy regarding banking services aligns with a stringent compliance framework designed to reduce the risk of losing access to banking services. By simultaneously engaging with 2 to 3 banks, we mitigate inherent banking risks. Diversifying our banking relationships not only strengthens our negotiating position but also enhances resilience within our financial infrastructure. This proactive approach not only protects against disruptions but also promotes stability and durability in our financial operations.

5.3 Legal And Corporate Providers

In the domain of legal and corporate services, numerous seasoned providers offer extensive expertise in the gambling industry. These specialists assist us in adhering to regulatory, payment, and banking obligations, ensuring comprehensive compliance.

6 RISK EVALUATION AND MANAGEMENT

Each department actively monitors its respective risks on a daily basis.

6.1 Risk Auditing

Internal audits, supervised by the Audit Committee comprising the Head of IT, Head of Legal, and Head of Finance, are conducted annually across all risk categories. External audits, performed every three years, offer an independent assessment of business and financial operations.

Regular audits are conducted on the platform, its software providers, infrastructure, and financial status. The Audit Committee quarterly reviews the risk register, in addition to maintaining regular interdepartmental communication.

Additionally, mandatory financial audits are annually conducted for all companies within the organization's structure.

6.2 Risk Overview

- **Legal Environment (Overseen by: Head of Legal):** The online gambling legal landscape is dynamic, requiring ongoing monitoring. It's crucial to stay updated on legal developments, with regular updates disseminated across departments to keep all staff informed about evolving regulations. Collaboration between the legal team and other departments, such as compliance and operations, ensures a thorough understanding of legal obligations and facilitates process implementation. Open communication channels with regulatory bodies and industry associations promote transparency, emphasizing our commitment to complying with legal requirements in online gambling.

- a) **Legality and Licensing:** Operating an online casino requires obtaining licenses from relevant regulatory bodies in various jurisdictions. Compliance with regulatory requirements is essential due to significant disparities between jurisdictions. Non-compliance may result in severe penalties, legal consequences, or even the cessation of operations.

Mitigation: Currently, the Operator holds Gaming Curacao license No. 365/JAZ and is actively pursuing a new GCB license.

- b) **Data Protection and Privacy Laws:** Online casinos manage extensive volumes of sensitive customer data, making compliance with data protection regulations like the EU's General Data Protection Regulation (GDPR) crucial to avoid fines and maintain customer trust.

Mitigation: Only gather and process the minimum necessary personal data for providing gambling services, ensuring data is not retained longer than necessary. Develop and implement a data breach response strategy to promptly address and mitigate the impact of data breaches, including procedures for informing data subjects and relevant supervisory authorities within required timeframes. Incorporate privacy by design and default principles into the development of new products, features, or services, embedding privacy considerations from the outset.

- c) **Advertising and Marketing Restrictions:** Many jurisdictions enforce strict regulations on the advertising and marketing of online gambling services to protect vulnerable populations, such as minors and individuals struggling with gambling addiction. Non-compliance with advertising standards can result in regulatory penalties and public backlash.

Mitigation: Monitor advertising and marketing activities continuously to ensure

compliance with relevant laws, regulations, and industry norms governing gambling advertising. Transparently disclose all terms, conditions, restrictions, or limitations associated with promotions, bonuses, or other marketing offers to prevent misleading consumers and potential regulatory consequences. Conduct thorough evaluations of third-party advertising partners, agencies, or affiliates to confirm their compliance with advertising and marketing regulations and commitment to responsible advertising practices.

- d) **Cross-Border Regulatory Challenges:** Operating across multiple jurisdictions can expose online casinos to complex regulatory frameworks and legal uncertainties. Variations in gambling laws and enforcement practices across borders can create hurdles for ensuring compliance and may require significant legal resources.

Mitigation: Establish strategic partnerships with local enterprises, legal advisors, or industry associations in target jurisdictions to gain insights into local regulations, navigate regulatory procedures, and build relationships with regulatory authorities. Conduct thorough due diligence on business partners, affiliates, vendors, and other third parties to ensure compliance with regulatory requirements and mitigate compliance risks in cross-border markets. Stay informed about changes in gaming regulations and enforcement practices in target jurisdictions by actively monitoring regulatory updates, industry publications, and legal advisories.

- e) **Regulatory Evolution:** The regulatory landscape governing online casinos is continuously evolving, with frequent introduction of new laws, regulations, and enforcement measures. Operators must stay vigilant, staying updated on these changes and adjusting their operations accordingly to mitigate compliance risks.

Mitigation: Conduct comprehensive assessments to evaluate the potential impact of emerging regulations on the casino's operations, financial stability, and risk exposure. Identify areas of compliance vulnerability and develop proactive strategies to address them. Implement dynamic compliance approaches that enable swift adaptation to evolving regulatory requirements. This may involve developing modular compliance solutions, leveraging technology for automation and efficiency, and fostering a culture of continuous improvement and innovation. Provide regular training and educational resources to staff on emerging regulations, compliance priorities, and best practices for upholding regulatory standards. Empower team members to recognize and respond effectively to regulatory changes within their respective roles.

- f) **Regulatory Enforcement:** Regulatory bodies may initiate investigations or audits to ensure compliance with gambling regulations. Enforcement actions, such as penalties, license withdrawals, or legal proceedings, can have significant consequences for iGaming operators found in violation of regulatory standards.

Mitigation: Conduct regular internal audits and assessments of compliance protocols, operations, and procedures to identify areas of non-compliance, assess risks, and implement proactive corrective measures. Foster transparent communication channels with regulatory authorities, industry associations, and stakeholders to establish trust, seek guidance on compliance issues, and address queries or concerns proactively. Maintain thorough documentation and records of compliance efforts, including policies, protocols, training materials, audits, and enforcement actions, to demonstrate commitment to compliance and provide support for regulatory inquiries or investigations.

- g) **Political and Public Perception:** The perception of gambling within political and public spheres can significantly shape regulatory decisions and policy directions. Negative publicity or public disapproval of iGaming operators may lead to increased

regulatory scrutiny and demands for stricter oversight.

Mitigation: Promote transparency across business operations, regulatory compliance, and corporate governance to build trust among regulators, customers, and the public. Provide educational materials to educate the public about the online casino industry, responsible gambling practices, and potential risks associated with gambling. Advocate for awareness of problem gambling support services, hotlines, and resources. Monitor both online and offline platforms for discussions, reviews, and mentions related to the online casino brand, and proactively address any negative feedback or misconceptions through targeted communication and engagement strategies.

- **Regulatory Risks (Overseen by Compliance Officer):** Businesses, particularly those in financial and gambling sectors, face regulatory challenges related to Anti-Money Laundering (AML) and Know Your Customer (KYC) compliance. The AML&KYC department is tasked with upholding relevant laws to combat money laundering and terrorist financing, implementing robust protocols for customer verification, transaction monitoring, and reporting anomalies. Non-compliance carries severe consequences such as fines and reputational damage. Thus, strict adherence to regulations is vital. The department oversees compliance efforts, conducts risk assessments, and provides ongoing training to employees. Effectively managing these risks demands a proactive approach, with the AML&KYC department at the core of the compliance framework.

- a) **Compliance and Anti-Money Laundering (AML) Regulations:** Online casinos must adhere to stringent compliance standards to prevent money laundering, terrorist financing, and other illicit activities. Inadequate AML controls can result in regulatory fines and reputational harm.

Mitigation: Establish a comprehensive AML policy outlining protocols for customer due diligence, transaction monitoring, and reporting suspicious activities. Ensure alignment with regulatory mandates and industry standards. Conduct regular training for staff on AML regulations and indicators of suspicious behavior to prevent illicit activities.

- **Technical Risks (Overseen by Technical Department):** The technical department oversees critical areas including infrastructure maintenance, platform integration, cybersecurity, and data security. Its core objective is to ensure uninterrupted infrastructure operations by conducting regular maintenance to minimize downtime caused by hardware or software failures. Prioritizing the implementation and updating of cybersecurity protocols and technologies is crucial to defend against cyber threats such as hacking, data breaches, and malware attacks. Vigilant monitoring for potential security threats and prompt response to incidents are key responsibilities, helping to mitigate risks and minimize the impact of cybersecurity breaches. Furthermore, conducting periodic audits and security assessments aids in identifying vulnerabilities in the infrastructure, enabling proactive risk management.

- a) **Data Security:** Unauthorized access to customer information, including personal and financial data, poses significant risks such as identity theft, fraud, and potential legal consequences.

Mitigation: Implement multi-layered cybersecurity protocols comprising firewalls, intrusion detection systems, and encryption mechanisms. Ensure timely updates of software and security patches to address vulnerabilities and guard against emerging threats.

- **Financial Risks (Overseen by Head of Finance):** Financial risks are inherent in all business operations, requiring meticulous management for sustainability and growth. As the individual accountable for financial oversight, the Head of Finance plays a crucial role in

identifying, assessing, and mitigating these risks. Responsibilities include implementing robust financial controls, monitoring cash flow, and optimizing capital allocation to minimize exposure. Additionally, close collaboration with other departments is essential to develop and execute financial strategies aligned with organizational objectives. Through proactive risk management and strategic planning, the Head of Finance aims to safeguard the company's financial health and enhance shareholder value. Regular financial analysis and reporting are crucial for identifying emerging risks and opportunities, facilitating timely adjustments to financial strategies.

a) **Taxation:** Taxation policies concerning online gambling vary widely among jurisdictions and can significantly impact the profitability of iGaming operators. Changes in tax laws or unexpected tax liabilities can present financial risks to casino operators.

Mitigation: Engage tax professionals, accountants, and legal experts specializing in international taxation to ensure compliance with local tax laws and regulations. Utilize tax treaties and agreements between countries to mitigate double taxation and optimize tax planning strategies. Maintain accurate financial records, robust accounting systems, and diligent tax filings to adhere to local tax laws and regulations in each jurisdiction where the casino operates. This entails timely submission of tax returns, payment of taxes, and adherence to reporting requirements.

- **Litigation Risks (Overseen by Customer Service):** Customer service-related risks entail ensuring that practices align with relevant laws and regulations to minimize the risk of litigation stemming from regulatory non-compliance. Customer Service establishes clear communication policies to effectively manage customer expectations, thereby reducing the likelihood of misunderstandings and potential litigation. Maintaining comprehensive documentation of customer interactions and resolutions is vital for mitigating litigation risks, providing evidence of compliance with service standards and facilitating amicable dispute resolution. Customer Service regularly evaluates and enhances its processes based on feedback and performance metrics to address recurring issues and minimize the risk of customer dissatisfaction leading to litigation. Promoting a culture of transparency and accountability within the customer service team fosters trust with customers and diminishes the likelihood of disputes arising from perceived unfairness or lack of clarity. Establishing clear escalation protocols ensures that unresolved customer issues are promptly addressed by appropriate management levels, preventing grievances from escalating into potential litigation.

a) **Responsible Gaming Practices:** Regulatory mandates often require casino operators to advocate for responsible gambling and institute measures to deter problem gambling behaviors. Non-compliance with responsible gaming regulations can result in regulatory penalties and tarnish the operator's reputation.

Mitigation: Deploy self-exclusion tools enabling players to voluntarily exclude themselves from gambling activities for a specified duration. Ensure these tools are readily accessible and prominently featured on the casino's website and gaming platforms. Provide players with the ability to set customizable deposit limits and timeouts on their accounts to manage their gambling habits and prevent excessive play. These limits should be easily adjustable and enforceable to ensure adherence. Utilize data analytics and monitoring tools to detect players displaying behaviors indicative of potential gambling problems, such as high frequency or substantial wager amounts. Implement interventions and support measures for these players as necessary, providing assistance and guidance to promote responsible gambling.

practices.

6.3 Risk Of Potential Capital Loss

In the initial phase, there's a potential for losses in registration fees, rent, and office equipment funds. If the online casino closes due to internal or external reasons, the security deposit is refunded to the owners. However, it's vital to keep this amount untouched during continuous operation, solely reserved for jackpot winnings to minimize losses.

Mitigation:

Leveraging 25 years of combined experience in the online casino industry among the founders and co-owners, along with the seasoned managerial expertise of the project mentor, positions the project strategically to mitigate risks associated with market entry to the fullest extent possible.

7 POLICIES AND PROCEDURES

7.1 Know Your Customer

The KYC (Know Your Customer) policy comprises a series of protocols and principles designed to confirm and validate the identity of clients. Its primary aim is to thwart financial illicit activities such as money laundering, terrorist financing, and fraud by ensuring that casinos possess precise data concerning their patrons and their financial transactions. By implementing KYC measures, casinos foster trust, adhere to regulatory mandates, and minimize the risks linked with unlawful activities within the financial realm.

7.2 Anti-Money Laundering

The primary objective of an Anti-Money Laundering (AML) policy is to hinder the unlawful practice of disguising the sources of funds acquired through criminal endeavors. AML policies and protocols are crafted to identify and discourage money laundering, terrorist financing, and various other illicit financial undertakings within financial institutions.

7.3 Data Privacy

The aim of a Data Privacy Policy is to delineate how an organization gathers, utilizes, retains, and safeguards the personal data of individuals. It exists to guarantee adherence to data protection laws, protect the privacy rights of both customers and employees, and foster confidence among stakeholders. Through articulating precise guidelines and protocols for managing sensitive data, the policy strives to diminish the likelihood of data breaches, unauthorized entry, and improper use of personal information, thus advancing transparency and responsibility in data handling procedures.

7.4 Responsible Gaming

The purpose of the Responsible Gaming Policy is to encourage safe and mindful gambling practices while addressing the potential dangers of excessive or problematic gambling. It delineates strategies and recommendations aimed at shielding players from the adverse effects of gambling addiction, including financial strain, mental health challenges, and social difficulties. Through provisions for self-exclusion options, establishment of gambling activity limits, and facilitation of assistance for individuals seeking aid, the policy strives to cultivate a responsible and enduring gambling atmosphere. Its objective is to safeguard the welfare of players and uphold the credibility of the gaming sector.

7.5 Terms Of Use

The Terms of Use policy for an online casino sets forth the guidelines, standards, and terms that users are required to follow when utilizing the platform. It encompasses areas like user obligations, account administration, payment protocols, conflict resolution, and adherence to relevant laws and statutes. Through acceptance of these terms, users confirm their comprehension of the regulations governing their engagement with the casino, guaranteeing transparency, equity, and lawful adherence across all facets of the gaming encounter.

7.6 Self-Exclusion

This details the procedure through which individuals can voluntarily opt to exclude themselves from participating in gambling activities on the platform for a specified period, typically aimed at managing gambling habits or addressing addiction concerns.

7.7 Dispute Resolution

This outlines the processes and mechanisms available for resolving conflicts or disputes that may arise between the casino and its users, often including steps for escalation and eventual resolution.

7.8 Fairness & RNG Testing Methods

Addresses the fairness of games offered by the casino, confirming their randomness and impartiality, often emphasizing the use of Random Number Generators (RNGs) and the methods employed to evaluate and verify their fairness.

7.9 Accounts, Payouts & Bonuses

Provides details on account management procedures, payout methods, and the terms and conditions associated with bonuses, including wagering requirements and limitations.

7.10 Betting Rules

Specifies the rules and regulations governing betting activities on the platform, including game-specific guidelines, maximum and minimum bet limits, and any additional terms applicable to various types of bets.

7.11 Internal Policies

Human Resources Policy: Encompassing guidelines for recruitment, orientation, performance assessment, employee development, fostering diversity and inclusion, disciplinary actions, and termination protocols.

Financial Policy: Encompassing directives for financial planning, expenditure oversight, adherence to financial reporting standards, auditing procedures, procurement guidelines, and compliance with accounting regulations.

Communication and Social Media Policy: Establishing protocols for internal and external communication platforms, including email protocols, social media regulations, media interactions, and branding guidelines.

Information Security Policy: Outlining measures for safeguarding sensitive data, including data management procedures, cybersecurity protocols, password security guidelines, and strategies for preventing data breaches.

Internal policies primarily support external policies, with the latter undergoing periodic review and updates, while the former are continuously created, modified, and ceased as necessary.

7.12

Given our long-term operational goals and substantial initial investment, it is imperative to adopt and enforce policies. This is crucial, especially considering our dedication to operating under the GCB license for a minimum of three years. The renewal of this license is contingent upon achieving investment returns and meeting project Key Performance Indicators (KPIs), as detailed in our financial projections.

7.13

To ensure adherence to established policies and procedures, our project taps into a diverse range of expertise and resources, both internally and externally. With the Ultimate Beneficial Owner (UBO)

bringing a wealth of experience in both gambling and IT, he serves as an ideal overseer. Critical departments such as Legal, IT, Human Resources, and Finance possess significant know-how in sustaining large-scale gambling operations responsibly.

Moreover, jurisdictions like Curacao, Cyprus, and others offer ample opportunities for collaboration with advisors, experts, and independent auditors. The Gaming Control Board (GCB) extends support to operators by providing guidance and assistance in policy development. This collaborative effort allows operators to tailor their policies to meet regulatory requirements and industry standards.

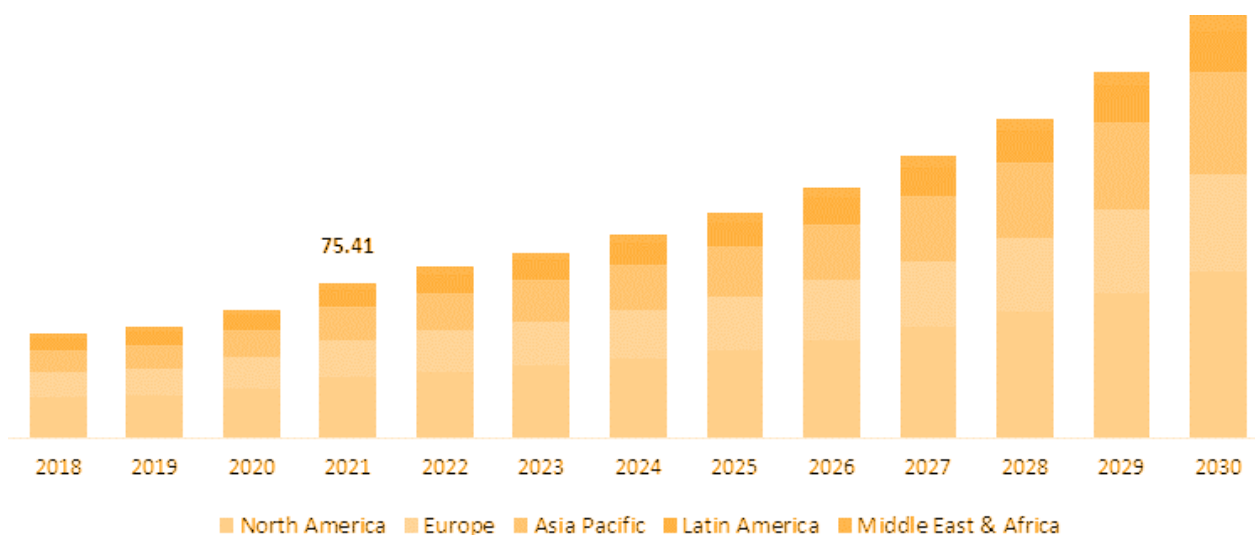
By leveraging the expertise and resources of the GCB, operators can establish robust policies that promote compliance and uphold integrity in the gambling sector. Additionally, the GCB offers ongoing support and updates to help operators adapt to evolving regulations and emerging challenges. In summary, the assistance provided by the GCB empowers operators to build and maintain a strong framework for responsible gambling practices.

8 OVERVIEW OF THE ONLINE GAMBLING MARKET

8.1 Revenue and Market Scale

In 2021, the worldwide online gambling market reached a valuation of USD 75.41 billion and is anticipated to witness a Compound Annual Growth Rate (CAGR) of 12.0% over the forecast period. Online gambling includes various activities like sports betting, casino games, and others conducted over the internet, offering consumers the convenience of gambling from their own surroundings. The industry's expansion is driven by the rising popularity of virtual wagering and the adoption of the freemium model in online gambling.

Diagram 2. Online gambling market size, by region, 2018-2030, \$ billion



Several factors are contributing to the growth of the online gambling industry, including the widespread adoption of smartphones, easy access to digital betting platforms, and increasing internet penetration. As of 2018, the American Gaming Association (AGA) reported over 2,800 active betting sites. The global rise of virtual payment gateways and the growing use of digital currency are additional factors expected to drive industry growth. Digital platform operators are capitalizing on this trend by introducing a variety of promotions and tournaments, attracting new audiences and presenting significant growth opportunities for the online gambling market.

The COVID-19 pandemic has positively impacted the online gambling sector. Lockdowns and restrictions led more consumers to turn to virtual platforms during financial and social crises. Research by Lund University indicates that, with the shutdown of sports and other events, consumers showed increased interest in virtual betting. Additionally, the closure of traditional gambling establishments during lockdowns prompted a significant shift toward digital platforms, contributing to the overall growth of the online gambling market during the pandemic.

In 2021, online casinos worldwide experienced significant success, attributed to the pandemic and widespread self-isolation measures. Many countries saw a one-third increase in the revenue of the entire gambling market compared to the previous year, highlighting the resilience and potential of

the online casino business model.

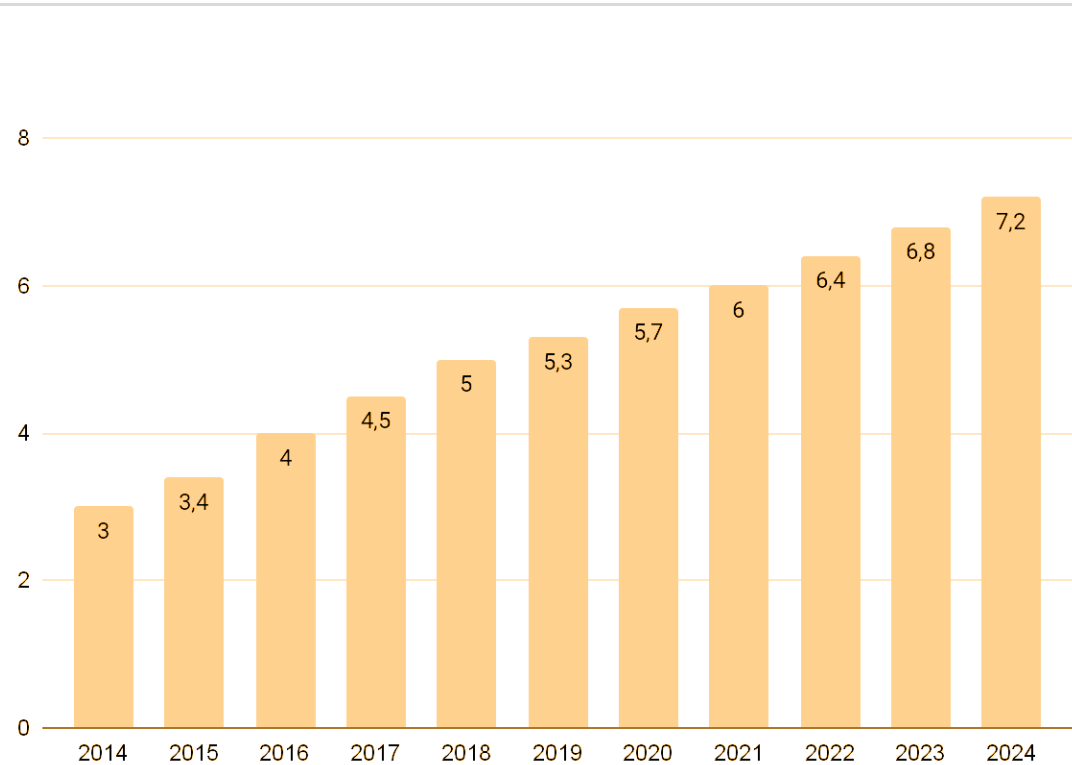
Over the past few years, 85 countries globally have legalized online gambling. Online betting, slot machines, and other gambling games collectively contribute to 70% of the income generated in the realm of Internet gambling.

The popularity of online gambling on a global scale can be attributed to the diverse range of offerings and a convenient gaming experience without constraints. Research by Juniper suggests that the turnover of online gambling betting is projected to reach \$950 billion by 2022, with continued growth anticipated.

Despite a general trend toward the regulation of national gambling markets, a few countries are moving in the opposite direction, opting for the prohibition of online gambling and mobile applications.

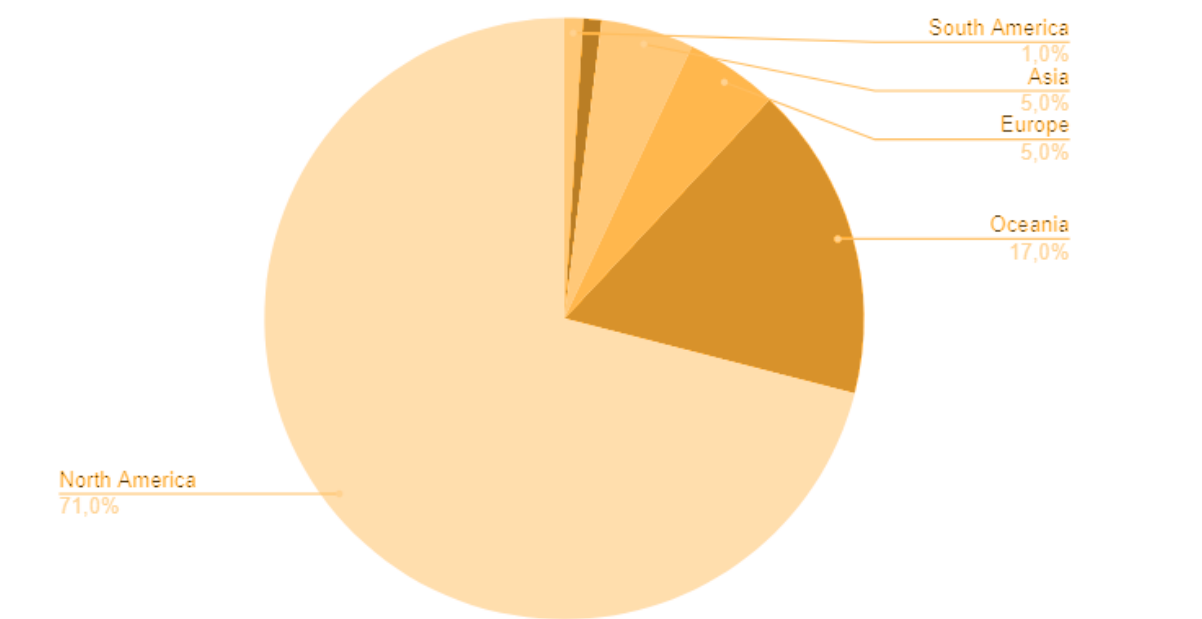
The global online gambling market currently represents 13% of the total global legal gambling market, and this percentage is continuously increasing. Approximately 85 countries have granted permission for online gambling activities.

Diagram 3. Projection for Gross Gaming Revenue, in billions of dollars.



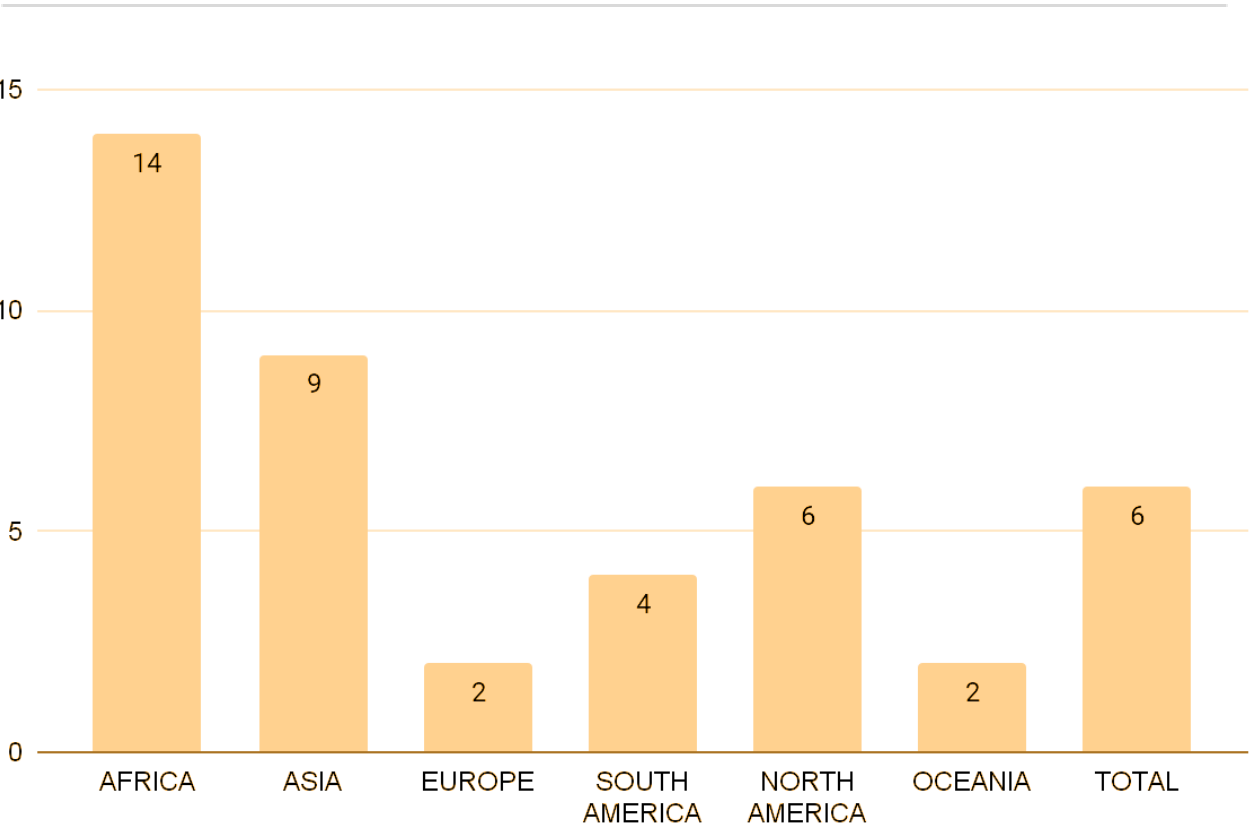
From a geographical perspective, North America continues to lead in the online casino industry, holding a significant 71% share of the overall market. Oceania, encompassing countries like Fiji, New Zealand, Polynesia, and New Guinea, also commands a noteworthy presence, representing 17% of the global Gross Gaming Revenue (GGR) in 2019. This positions Oceania ahead of both Asia and Europe, each contributing 5% to the global GGR

Diagram 4. Regional structure of gross income of the gambling business in 2022



Africa posted the fastest growth rate in 2022 at 14% YoY, while Europe experienced very modest growth.

Diagram 5. Growth in gross income by region in 2022

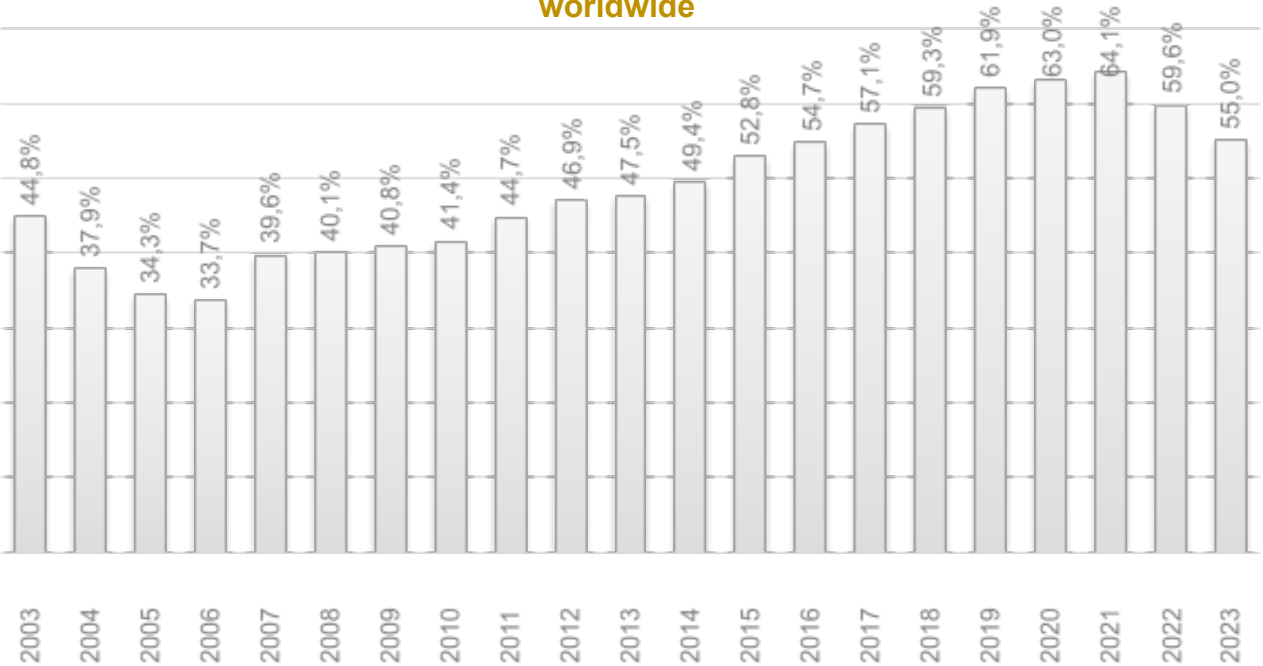


The European Union stands out as the largest regulated market in the online casino industry. Conversely, players from Iran face limitations, with access restricted to approximately 30% of casinos.

As per the European Commission, the online gambling industry is presently valued at \$14.7 billion and is experiencing continuous growth. Within the European Union, online casino gambling stands out as the fastest-growing segment, with an annual growth rate of 15%.

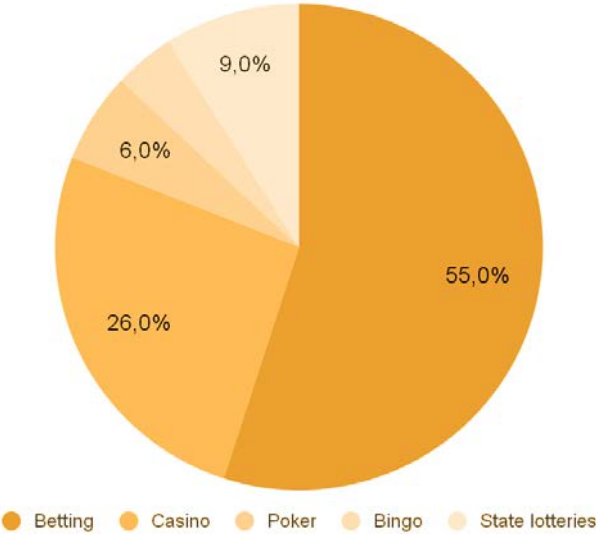
Discussions have been underway to streamline regulations in the industry. The European Commission highlights that operators of online gambling services within the European Union are obligated to acquire licenses from multiple countries, each with its unique set of licensing requirements. Advocates argue that a more universal approach would be advantageous, as the current compliance requirements result in unnecessary infrastructure duplication and costs. Simplifying regulations is considered a means to alleviate administrative burdens for regulators.

Diagram 6. The share of the "white market" in online gambling revenue worldwide



From 2003 onwards, the online gambling market has demonstrated sustained growth, with an average annual increase of 23%. Vital contributors to this expansion encompass betting, casino activities, and poker. The surge in online gaming's popularity is propelled by factors like the ubiquitous accessibility of the Internet, the emergence of new markets, and the inclusion of diverse player groups in the online gaming landscape.

Diagram 7. Online gambling income by game type



8.2 New groups of players

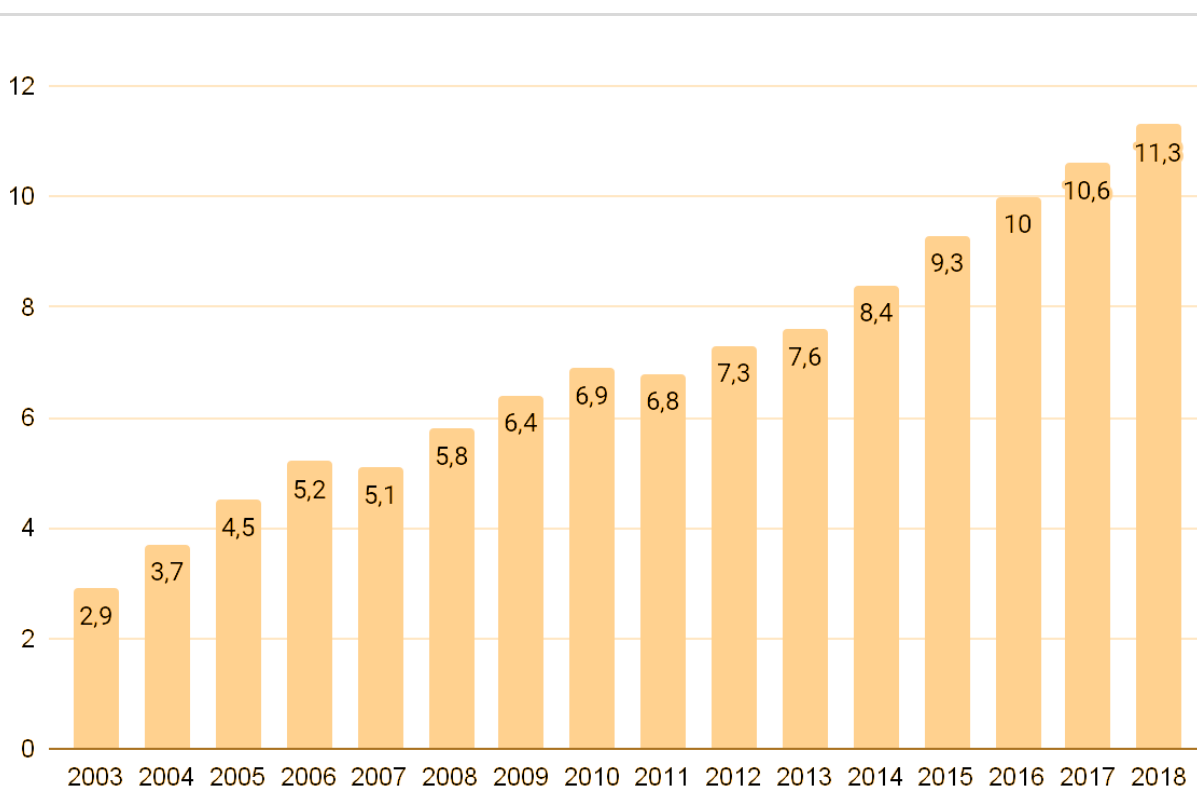
Since 2004, the number of female internet users aged 18 to 74 has risen by over 80%, while men have experienced a 60% increase during the same period. While online gambling has traditionally appealed mainly to young men, there is now a noticeable trend of growing popularity among women and older demographics.

Different player demographics showcase distinct preferences and motivations for participating in online gambling. Some engage for entertainment, others for financial gains, and some for relaxation. As the internet's influence extends across society, the once clear image of the average male player, typically aged between 25 and 35, is evolving into a more diverse profile.

According to a 2019 study by GP Bullhound, 43% of all online gamblers were women. Although bingo remains a popular choice among female players, their preferences encompass various gaming options. Research suggests differences in the gaming behavior of men and women, with women tending to play longer and place smaller bets, while men participate more frequently, bet larger amounts, but engage in shorter gaming sessions.

Bingo, in particular, is gaining popularity, providing players with the opportunity to unwind in a social setting.

Diagram 8. Share of online gambling income from total gambling income in the world

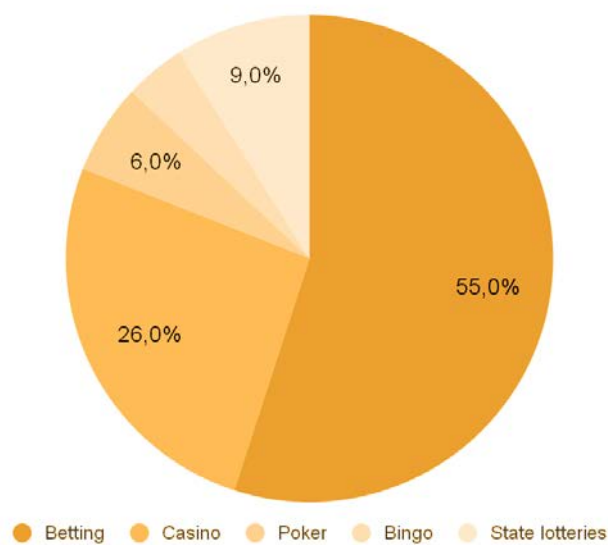


It is crucial to emphasize that prevalent forms of remote gambling today encompass traditional casino games, betting, and poker variations. The popularity of these diverse online gambling types often varies by gender, with the bingo sector expected to undergo the highest growth rates, reflecting an increasing interest from women in the iGaming industry.

Nevertheless, online gambling, in general, still experiences greater popularity among men. Young men, in particular, display a higher inclination for gambling. While women also enjoy playing, their preferences tend to lean towards simpler games such as lotteries and slots.

This gender-based disparity in preferences can be attributed to societal roles and socialization. Betting, casino games, and skill-based games have traditionally been associated with male audiences, whereas women often gravitate towards playing for enjoyment rather than seeking an adrenaline rush.

Diagram 9. Online gaming revenue by type, 2022



8.3 Contemporary Developments in Online Casino

In 2022, online casinos globally have enjoyed remarkable success, witnessing a notable one-third surge in the revenue of the global online gambling market compared to the preceding year. The online gambling sector has proven to be resilient, even during the 2008 financial crisis, establishing itself as a robust and enduring business model.

The gaming market is currently undergoing significant transformations propelled by emerging technologies. Mobile gambling is anticipated to undergo rapid development, with only the most innovative products expected to thrive in the competitive landscape. This evolution holds the promise of enhancing the quality of mobile gambling experiences for users.

While some technical changes, such as advancements in mobile data transmission speed, may go unnoticed by end users, substantial and distinctive improvements are anticipated. One particularly noteworthy advancement is the integration of virtual reality into online gambling. With the advent of technologies like Microsoft HoloLens, HTC Vive, and Playstation VR, video slots and other online games are poised to offer more spectacular and immersive experiences than ever before.

Virtual reality technology

Recent advancements in virtual reality (VR) technology have made it possible to authentically recreate the emotions and physiological sensations of being in a real casino. Through the use of VR glasses, individuals can now virtually walk through meticulously reconstructed gambling establishments, interact with dealers, and place bets at various gaming tables.

Leading players in the gaming industry, including Microgaming, Novomatic, NetEnt, Lucky VR, Topgame Technology, and others, are actively engaged in developing VR games. At the ICE Totally Gaming conference, Microgaming showcased an impressive display featuring a virtual roulette game, demonstrating the feasibility of virtual reality in the gambling industry.

NetEnt is actively exploring VR technologies, presenting experiences like the Jack and the Bean Tree slot machine at online gambling exhibitions. The realistic and immersive journeys provided by these VR experiences have garnered positive feedback from both players and industry competitors.

Novomatic, as a pioneer in implementing VR technology in online gambling, highlights the key advantages of realistic online games, including full immersion in gameplay, heightened emotions surpassing real-life experiences, the flexibility of playing from any location with an internet connection, and engaging and diverse storylines.

There is growing speculation about integrating virtual gameplay into social networks, and it is likely that such an idea will be realized in the near future. The ongoing developments in VR are poised to revolutionize the online gambling experience and offer players unprecedented levels of immersion and excitement.

Social games combined with slot machines

The social dimension of online gambling is witnessing a surge in popularity, as exemplified by the recent review of Microgaming's new Castle Builder 2 slot. This slot introduces advancements in spinning reels and betting, reflecting the evolving landscape of social gambling.

Social gambling offers a more dynamic and engaging experience compared to traditional slot machines. These games empower players to choose a playable character and navigate diverse paths based on the character's attributes. Characters can progress by accumulating experience, skills, and achievements, leading to more favorable gaming conditions. In this context, the slot machine serves not only to provide monetary winnings but also to offer resources essential for advancing in the game.

Given the current demand for slot machines with social gaming features, numerous developers are

actively engaged in creating such games. The latter part of 2022 has witnessed the release of several new products in this evolving category.

Progressive Poker Jackpot with a live dealer

Progressive jackpots, long favored by slot machine enthusiasts for their potential for substantial cash prizes, are now making their mark in the realm of poker. Evolution Gaming is at the forefront of this trend, pioneering the world's first Jumbo 7 Progressive Jackpot in Live Casino Hold'em.

Initiating at a generous €1,000,000, this jackpot progressively grows based on player activity. Todd Haushalter, Evolution Gaming's Product Director, envisions the jackpot reaching an impressive €30,000,000, adding an extra layer of excitement to poker gameplay. The game also incorporates a second-level jackpot with lower fixed payments.

Notably, other developers in the live online casino games sector are actively exploring the possibility of introducing enticing progressive jackpots to elevate the overall gaming experience for players.

Live games

Live dealer games have experienced substantial popularity in the past year, and this trend is projected to persist with additional advancements in 2024. The coming year anticipates a continued surge in the appeal of live games, especially when integrated with virtual reality (VR) technology. Developers are gearing up to craft even more realistic games with heightened functionality, with the goal of offering players an immersive and engaging gaming experience. Moreover, there are expectations within the industry to establish new studios exclusively dedicated to broadcasting live games in real-time, further contributing to the expansion and evolution of the live dealer gaming sector..

Skill games

A growing number of modern players are seeking to blend luck with their own skills, giving rise to platforms that showcase strategy games. These games demand players to employ specific skills, introducing an intriguing dimension to the gaming experience. The incorporation of skill games on gaming platforms is poised to garner substantial popularity, mirroring the increasing interest and demand for games that entail strategic thinking and player proficiency.

Gamification

This concept entails leveraging game dynamics and strategic thinking to engage an audience in the process and address marketing challenges. Gamification is poised to emerge as a prominent trend in the gambling industry, introducing new missions, competitions, bonus programs, and rewards to captivate and entice gamblers.

Entertainment content

Online casino operators are making concerted efforts to retain users on their platforms. Beyond traditional features like chats, they are now incorporating special sections with valuable non-gaming content, including movies, TV series, music videos, and TV shows. Furthermore, online casinos will provide plot details for many slots, enhancing the overall user experience and offering additional

engaging elements beyond the gaming itself.

Big data

Big Data technology is emerging as a significant trend in the current year, particularly in the progressive online gambling industry. This technology facilitates the collection and storage of vast amounts of information, proving indispensable for the evolving landscape of online gambling. The capability to analyze and categorize extensive data enables games to adapt effectively to the interests and needs of the target audience, enhancing the overall gaming experience.

Mergers and acquisitions

As per expert forecasts, the gambling market is poised for rapid growth, with its volume projected to surpass \$60 billion by 2023. This anticipated expansion indicates that gambling companies are likely to augment their capital and overall market presence in the forthcoming years.

Individual slots

The creation of customized slots for individual orders is expected to become a prominent service offered by top online casinos. Developing unique slots will empower operators to secure a competitive edge in the market and optimize brand awareness.

Cryptocurrencies

Cryptocurrencies are gaining traction in the gambling industry, driven by notable advantages such as anonymity, convenience, minimal fees, and the absence of legislative prohibitions. Bitcoin has already gained widespread use, and other cryptocurrencies like Litecoin, Dogecoin, Ethereum, Ripple, Monero, Zcash, and more are anticipated to become popular means of payment in online gambling.

Despite these benefits, concerns exist due to the current association of cryptocurrencies with the illegal or gray financial market. At the initial stage, it is advisable to exercise caution and refrain from employing cryptocurrency settlements with clients until regulatory frameworks are established, and concerns related to security, legality, and transparency are adequately addressed.

Security issues in online gambling

The emergence of new technologies has underscored the critical need to address security issues, particularly in light of the rising frequency of Distributed Denial of Service (DDoS) attacks. Online bookmaker sites, including major operators like Britain's William Hill, have encountered disruptions and incurred losses as a result of these cyber threats. Despite their substantial daily revenue, which can reach 5 million, the impact on services can result in significant financial losses.

In 2019, a considerable portion of investments made by gambling operators was dedicated to fortifying security measures. The aim was to protect against cyber threats and guarantee the stability of their services in the face of evolving challenges in the digital landscape.

8.4 Market Forecasts

According to Yogonet, the Juniper research company predicts that turnover in the online gambling segment will reach \$950 billion by 2024 and continue its growth trajectory. The study indicates a notable shift of gambling activities towards the online environment, with a specific emphasis on mobile applications. The proportion of bets made via mobile phones is consistently on the rise.

Despite the global trend towards regulating national gambling markets, some countries are opting for a complete ban on online and mobile gambling. The global online gambling market already constitutes more than 13% of the total global legal gambling market, and this share is expected to continue expanding.

Niche revenue is expected to reach \$65 billion by 2024, with the niche undergoing changes and reforms influenced by market dynamics. The Asian market remains the largest globally, experiencing growing demand each year. The year 2021 witnessed a trend of legalizing online betting and casinos in various countries, and this momentum is anticipated to persist in 2022, presenting new prospects for the industry.

In Africa, the online gambling market is in a phase of rapid development and growth. However, the main challenge lies in the lack of regulation in most countries on the continent. While casino activities are not explicitly prohibited at the legislative level, the absence of regulatory frameworks poses a hurdle to fully realizing the market's potential.

8.5 Online Gambling in Africa

Beyond entertainment and socialization, the prospect of financial gain stands as another significant motivator for individuals engaged in gambling. In African countries like Kenya and Nigeria, gambling is often perceived as a potential source of income or a shortcut to wealth.

These varied motivations are reflected in the behavior of players. Those who view gambling as a form of entertainment or social activity may participate infrequently, perhaps once a week or once a month. Conversely, individuals who consider it a means of income are more likely to place bets several times a week or even daily.

The growth of online gaming platforms, fueled by increased adoption of mobile payments and heightened demand for digital entertainment during the pandemic, has been noteworthy. In South Africa, for example, a government survey conducted in 2017 revealed a 14% annual growth rate in sports betting from 2008 to 2016. The share of online sports betting in the South African gambling market has surged to 45%, a stark contrast to a decade ago when casinos held 80% of the market share.

Sibongile Simelane-Quntana, Executive Director of the South African Responsible Gambling Foundation, noted a significant uptick in online sports betting following pandemic-related lockdowns. Funding for the foundation, sourced from gambling establishments, increased by 50%

compared to pre-lockdown levels.

For many African gamblers, winnings from gambling play a crucial role in meeting daily needs. A government survey highlighted a shift, with the percentage of respondents considering gambling a good source of income dropping from 22.7% in 2019 to 11.2% in 2022.

8.6 Online gambling in Asia Pacific

The advent of mobile phones has revolutionized gambling, making it accessible with just a click. Online gambling, which involves betting on sports activities or casinos over the internet, has become a prevalent practice.

Currently, the Asia-Pacific region is witnessing a surge in online gambling, with the global pandemic accelerating its growth and transforming the dynamics of the market. Previously confined to physical casinos, the internet has fueled substantial growth in online gambling in the Asia-Pacific region.

As of the market overview for 2023-2028, the Asia-Pacific online gambling market reached USD 19.5 billion in 2022, with an expected growth to USD 37.5 billion by 2028 at a CAGR of 11.39%. According to data from The Guardian, the UK surpasses even the United States as the largest online gambling market globally.

Key factors influencing online gaming include:

Mobile Internet: The widespread use of mobile internet significantly contributes to the growth of European companies in the gambling sector.

Legalized Platforms: Online networks provide legalized gambling platforms, with cricket in India serving as a prime example, indicating a robust future for this segment.

Cashless Transactions and Electronic Devices: The adoption of cashless transactions, customizable budgets, and electronic devices are primary factors propelling the growth of the online gambling market.

Reports indicate that sports betting dominates the majority of the market share in the Asia-Pacific online gambling market. Mobile devices are the preferred choice for online gambling. Key regions driving the online gambling market include China, India, Japan, South Korea, Indonesia, among others. Online gaming is experiencing rapid growth in India, particularly during Covid lockdowns, with China remaining a dominant force in the Asia-Pacific online gambling market.

8.7 Risks factors of online gambling

Online gambling presents a unique set of risks, especially given the challenges posed by the COVID-19 crisis. For individuals grappling with gambling issues, the allure of online gambling can be particularly tempting and detrimental. Here are six risk factors associated with online gambling:

- **Easy Access:** With just a few clicks or taps, gamblers can readily access a plethora of games and betting opportunities directly from their devices.
- **Isolated Playing:** In contrast to the social atmosphere of casinos, online gambling is often a solitary activity. For those dealing with gambling problems, the ease of concealing the frequency and location of their play is a concern.
- **Unlimited Play Time:** Online gambling sites operate 24/7, providing individuals with the

opportunity to engage in play at any time, day or night.

- **Seemingly Unlimited Betting Funds:** The use of credit cards facilitates swift bets and losses. Unlike casinos where money is exchanged or loaded onto registered loyalty cards, credit cards require no loading or reloading, making it easier to lose track of expenditures. Substantial losses can also adversely affect credit scores.
- **Unregulated Websites:** Fraudulent or unregulated gambling sites may exploit players, and tracking them down for remedial action can prove challenging if issues arise.
- **Cybersecurity Issues:** Due to the lack of regulation on some sites, personal data, including credit card and banking account details, may be susceptible to hacking or scams. Furthermore, contact information may be shared with third-party entities to promote gambling sites and related offers.

9 INVESTMENT PLAN

9.1 Volume and structure of investments

The total investment required for the project is 225,8 thousand EUR.

The funds raised under the project are planned to be distributed in the following areas of financing:

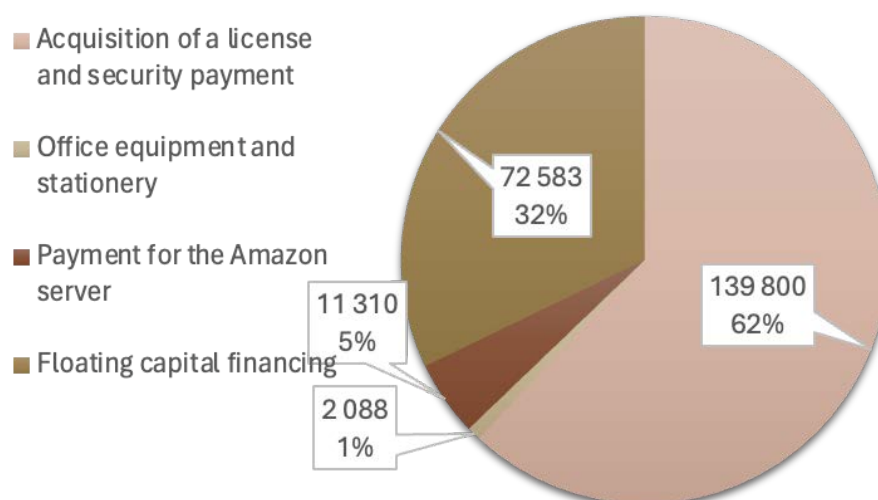
- Acquisition of the platform core (back office);
- Payment for the Amazon server;
- Office equipment and stationery;
- Floating capital financing.

Table 5. Investment budget, EUR

No	Name	Value
1	Acquisition of a license and security payment	139 800
2	Payment for the Amazon server	11 310
3	Office equipment and stationery	2 088
4	Floating capital financing	72 583
Invested capital total (actual need for cash)		225 781

The largest share in investment costs is floating capital financing (about 62%).

Diagram 10. Structure of the investment budget



9.2 Key Project Milestones and Investment Implementation Timeline

Table 6. Financial plan, EUR

		Total for 3 years	Apr-24	Jul-24	Aug-24	Feb-25
1	Acquisition of a license and security payment	139 800	139 800	-	-	-
2	Payment for the Amazon server	11 310	-	11 310	-	-
3	Office equipment and stationery	2 088	-	2 088	-	-
4	Floating capital financing	72 583	4 850	-	42 162	25 571
	Investment total excl. floating capital	153 198	139 800	13 398	-	-
	Invested capital total (actual need for cash)	225 781	144 650	13 398	42 162	25 571

The duration of the investment period (before the launch of the project) is 0,3 years.
A phased work schedule with a financing schedule is presented in the table below.

10 PLAN FOR INCOME

10.1 Scope of services

Planned number of casino guests

The targeted number of new guests to be attracted is 2300 people per month, revenue is calculated based on the monthly retention of unique users an average of 3,586 people per month with the retention rate – 33%. The expected average income per guest is 45.5 euros per month. Additional funds need to be invested in advertising to either retain or re-attract the guest.

10.2 Volume of income

The average monthly income for the project period (3 years) will be about 163.7 thousand euro.

Diagram 11. Dynamics of proceeds, euro

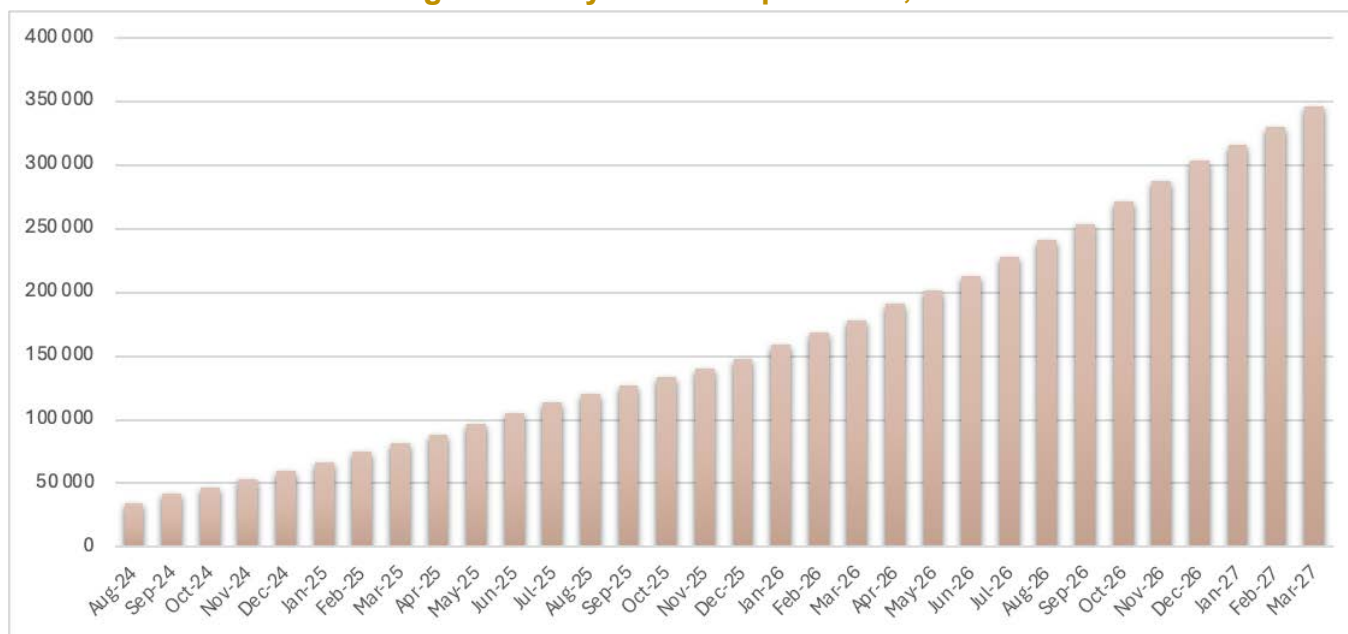


Table 7. Income and direct cost plan, EUR

		Total for 3 years	2024 (9M)	2025	2026	2027 (3M)
Physical indicators	Unit					
Total number of clients	ppl	114 759	5 165	28 506	59 265	21 823
Number of new clients	ppl	73 601	4 573	20 057	36 123	12 848
Number of current clients	ppl	41 158	593	8 448	23 142	8 974
Proceeds		5 221 530	235 018	1 297 008	2 696 576	992 928
Income from clients	45,50	5 221 530	235 018	1 297 008	2 696 576	992 928
Direct costs		3 000 472	208 166	735 152	1 517 711	539 442
Advertising costs	18	1 405 705	104 022	380 168	682 726	238 790
Additional staff costs	1 600	1 040 000	0	152 000	632 000	256 000
Salary		329 600	51 500	123 600	123 600	30 900
License fees		143 461	39 878	48 745	48 745	6 093
Depreciation	60 m	81 706	12 767	30 640	30 640	7 660
Indirect costs		487 200	56 125	178 700	178 700	73 675
Accounting		126 667	19 792	47 500	47 500	11 875
Office equipment maintenance		86 133	13 458	32 300	32 300	8 075
Hosting		128 000	0	44 000	44 000	40 000
Office rent		50 400	7 875	18 900	18 900	4 725
Legal support		96 000	15 000	36 000	36 000	9 000

11 MARKETING PLAN

Crazybet is tailored for individuals aged 18 and above, offering a unique and responsible gaming experience. This comprehensive marketing plan delineates strategies to build brand resonance, captivate the target audience, and stimulate sales through innovative and ethical initiatives.

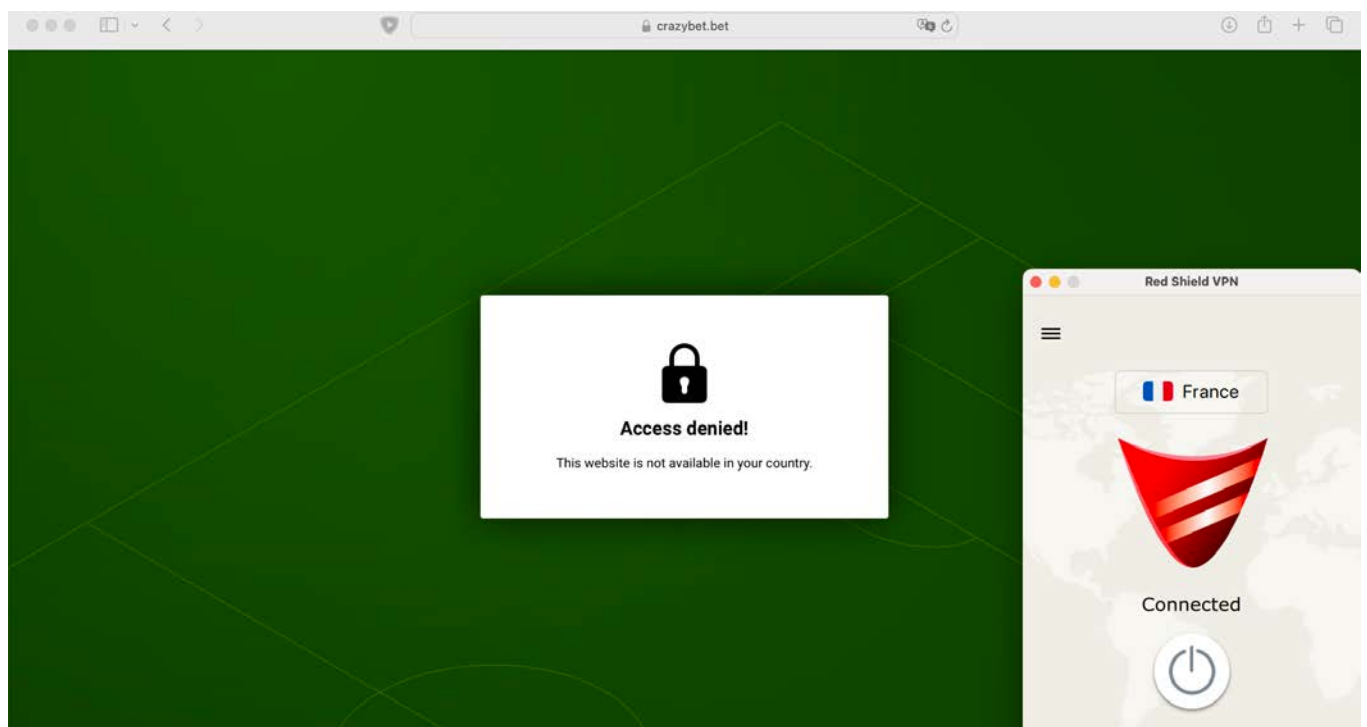
A. Target Audience:

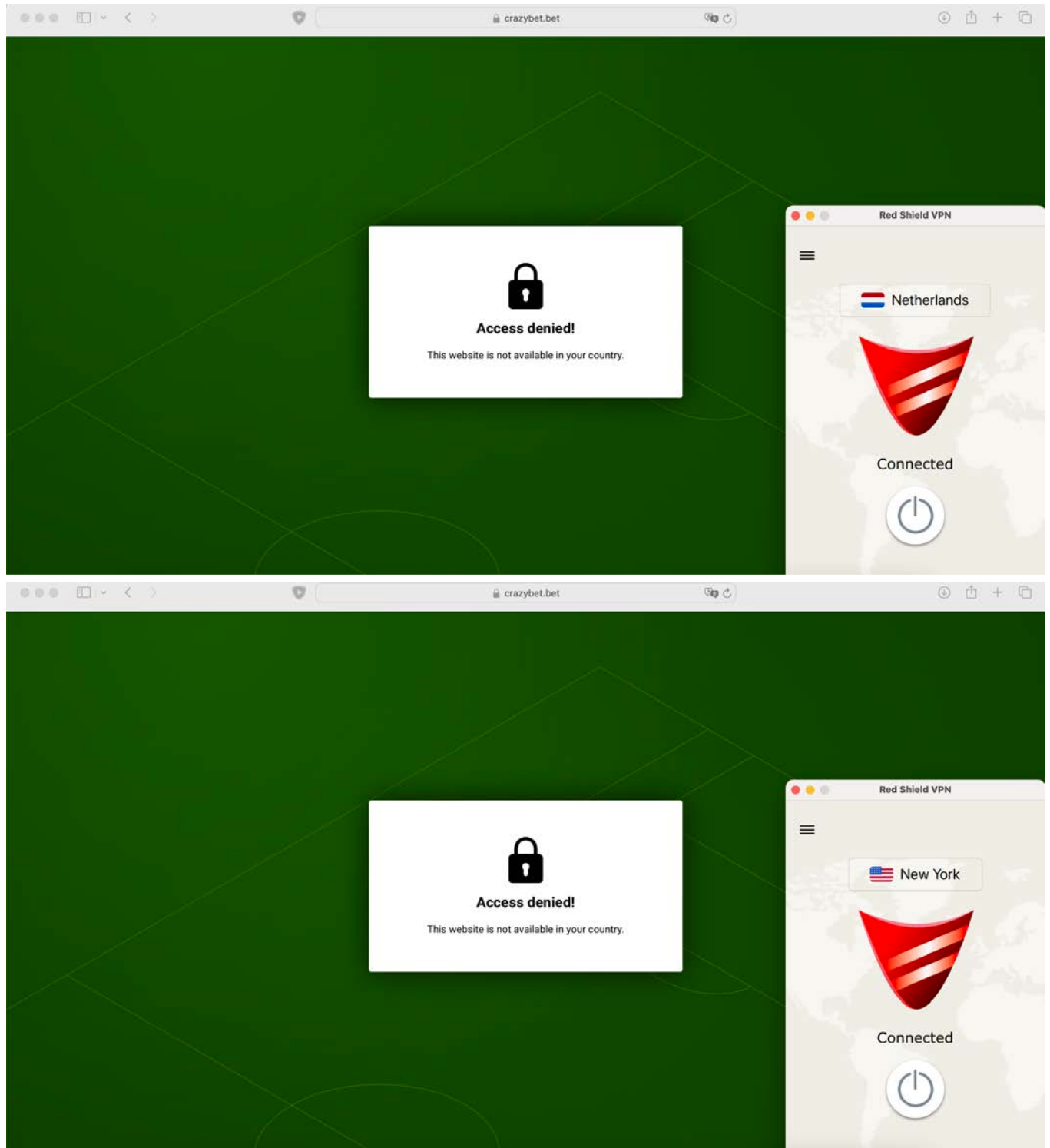
Demographics: Mainly focusing on individuals aged 18 and above, with a specific emphasis on the 21-35 age bracket.

Geographics: India, Turkey, Canada (except Ontario).

Psychographics: Catering to enthusiasts of advanced technology, gaming aficionados, and individuals who appreciate a dedication to responsible gaming practices.

Geoblock: USA, France, The Netherlands, The Dutch Caribbean Island: Curacao, Aruba, Bonaire, St. Martin, St. Eustatius, and Saba.





B. Marketing Strategies:

a. Brand Identity:

Craft a compelling brand narrative that underscores our commitment to transforming the gaming landscape through innovation, excitement, and a robust foundation in responsible gaming. Position Crazybet as a hub for cutting-edge technology, diverse gaming experiences, and a vibrant gaming community.

b. Digital Realm Dominance:

Enhance the website to provide an intuitive user experience, ensuring seamless navigation across various platforms. Harness the potential of social media platforms for targeted advertising, compelling content dissemination, and initiatives to build a strong community.

c. Content Expedition:

Devise a content strategy incorporating engaging blog posts, interactive tutorials, and exclusive insights from developers to nurture a sense of community and sustained player engagement. Collaborate with gaming influencers and content creators to extend the reach and impact of NexusGamer Ventures.

d. Advocacy for Responsible Gaming:

Integrate responsible gaming messages seamlessly within marketing materials and gaming interfaces. Implement features like session duration reminders, spending limits, and voluntary self-exclusion tools to empower players and promote responsible gaming practices.

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C. Sales Expeditions:

a. Launch Enchantment:

Reveal captivating launch promotions and exclusive bonuses to captivate early adopters. Employ strategically timed limited-time offers to instill a sense of urgency and anticipation.

b. Partnership Expedition:

Forge strategic alliances with gaming affiliates, influencers, and complementary brands to enhance visibility and attract a wider audience. Establish an enticing affiliate program to incentivize third-party promotion.

c. Data-Driven Enhancement:

Utilize analytics tools to extract insights into player behavior, preferences, and the effectiveness of various acquisition channels. Drive data-driven optimizations in marketing strategies, targeting precision, and overall user experience.

d. Customer Harmony Mastery:

Implement an agile Customer Relationship Management (CRM) system to tailor communications, promotions, and offers based on individual player preferences. Leverage targeted email marketing campaigns for personalized promotions and real-time updates.

D. Evaluation Yardsticks:

Consistently track key metrics such as customer acquisition cost, conversion rates, player lifetime value, and overall customer satisfaction.

Conduct regular reviews and make agile adjustments based on performance analytics to ensure optimal outcomes.

12 PROJECT EXPENDITURES

12.1 Fixed costs

Salary

According to the staffing table, the total expected workforce consists of 5 individuals with a standard workload, each receiving an average monthly salary of 1780 EUR.

The total monthly payroll is projected to be 10,300 EUR.

Employee compensation will be determined by the hours worked, with future plans for the development of a system that incorporates financial incentives such as bonuses.

Table 8. Staffing table and salaries, EUR

No	Position	Number of people	Salary	Total per month
1	Director	1	2 400	2 400
2	Site developer	1	1 700	1 700
3	Designer	1	1 700	1 700
4	Advertising specialist	1	1 700	1 700
5	Employee	2	1 400	2 800
	Total	6		10 300

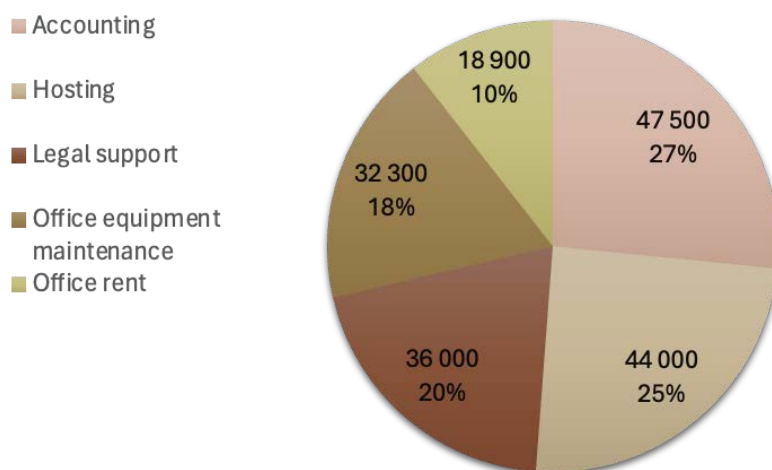
5 additional staff are employed for every 6000 new clients. The cost of additional personnel is shown in variable costs.

Other Incurred Fixed Expenses

Table 9. Fixed costs, EUR

No	Item of expense	Total per year
1	Accounting	47 500
2	Office equipment maintenance	32 300
3	Hosting	44 000
4	Office rent	18 900
5	Legal support	36 000
	Total	178 700

Diagram 12. The structure of fixed costs



12.2 Variable costs

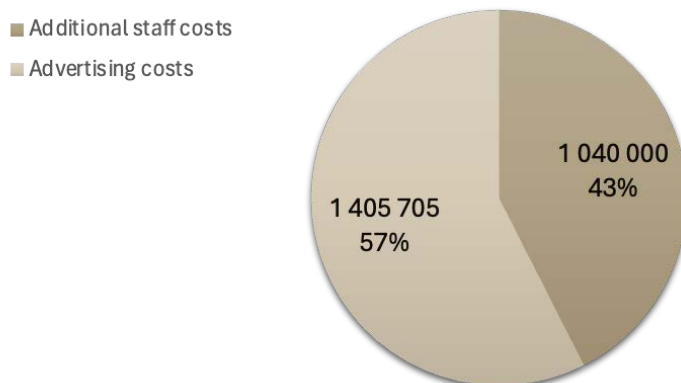
Direct production costs

A complete list of current variable costs is presented in the table below

Table 10. Variable costs, EUR

No	Item of expense	Per unit, total	Calculation base
1	Advertising costs	18	for 1 client
2	Additional staff costs	1 600	for 1 person

Diagram 13. Structure of variable costs (to the total volume of variable costs)



13 PLAN FOR FINANCIAL MANAGEMENT

13.1 Factors for enticing investment resources

Financial resource requirements and financing structure

The financial need for the project is set at 225.8 thousand EUR. The funding for this project is expected to be sourced from both the investor and the company's internal reserves.

The investor's capital is designated at 225.8 thousand EUR. Co-investor funds will be repaid upon the realization of profits.

13.2 Indicators of the cash flow plan

Investment activities

The investment cash flow balance of the project is determined by summing up all long-term financial investments (investment budget), excluding working capital, resulting in a total of 153.2 thousand EUR.

Operating activities

Positive cash flows from operating activities are generated by sales proceeds, while negative cash flows are attributed to the company's operating costs.

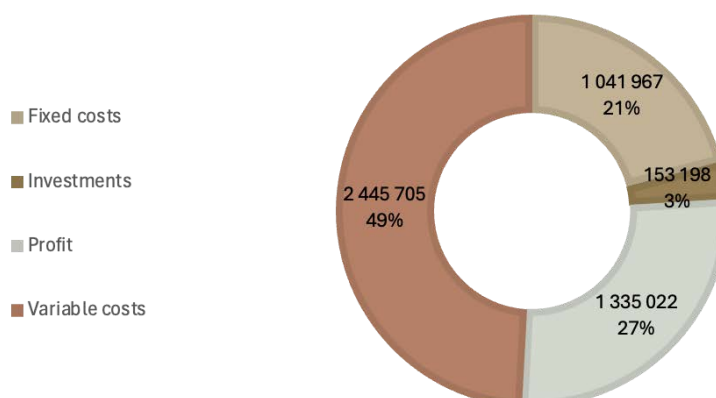
The total proceeds for the project period amount to 5,221.5 thousand EUR.

Negative cash flow amounts to 3,804.3 thousand EUR and is composed of the following main components:

- Direct costs: 2,918.3 thousand EUR.
- Indirect costs: 487.2 thousand EUR.
-

Consequently, the balance on operating activities at the conclusion of the project will be equivalent to the net profit, totaling 1,417.2 thousand EUR.

Diagram 14. Distribution Structure of Sales Proceeds to Costs and Profit



Financial activities

The financial flow consists of receipts of own and credit funds for financing the project, as well as their subsequent reimbursement.

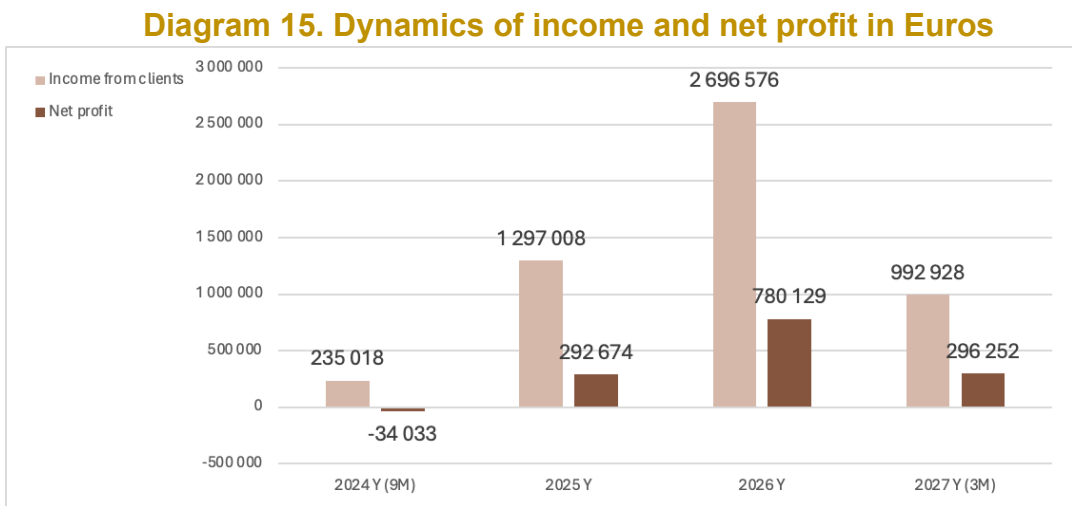
Thus, the financial balance is zero.

13.3 Indicators of Profit and Loss Plan

The project is projected to generate total revenues of 5,221.5 thousand euros over its duration, with direct costs totaling 3,000.4 thousand euros. Consequently, the gross profit is estimated at 2,221.1 thousand euros.

Fixed costs for the project period are anticipated to amount to 487.2 thousand euros. This leads to a profit before tax of 1,733.8 thousand euros. Considering the income tax rate of 22.0% on the taxable base, the estimated income tax is 398.8 thousand euros.

The net profit, factoring in the depreciation write-off of the entire investment cost, is projected to be 1,335.0 thousand euros. Further details of the profit and loss plan are outlined below.



13.4 Financial Outlook for the Project

The project spans 36 months (3 years), with a 4-month (0.3 years) investment phase and a subsequent working period of 32 months (2.7 years) post-launch.

The project anticipates total sales proceeds of 5,221.5 thousand EUR throughout its implementation.

The projected total cost for the project period is 3,886.5 thousand EUR.

The average monthly net operating income is estimated at 44.4 thousand EUR.

The net profit at the project's conclusion is forecasted to reach 1,335.0 thousand EUR.

Table 11. Financial and investment indicators of the project

Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	153 198
Sum of proceeds (SP), EUR	5 221 530
Net average operational receipts per month (NAOR), EUR	44 440
Net profit for the project period, EUR	1 335 022
Average profitability for the project period (net profit to proceeds	25,57%
Discounting rate (DR), %	19,10%
Net present value (NPV), EUR	735 307
Average Rate of Return of investments (ARR)	209,95%
Return on investment (ROI)	771%
Profitability index (PI)	4,8
Internal rate of return (IRR)	134,12%
Pay back period of the project in whole (PBP), incl. financing scheme	16 months
	1,3 years

14 SENSITIVITY ANALYSIS

14.1 SWOT analysis

Table 12. SWOT analysis

