

Business Plan

EastPoint Operations B.V.
BigWins Brand

March 2024

Overview

EastPoint Operations BV, under its premier brand 'BigWins' (<https://bigwins.com>), is a startup online casino that has been active in various markets for about a year under a Curacao license. EastPoint Operations BV is part of the group of companies under MoonRocket Holdings Ltd (Cyprus).

The team's mission is to use their extensive experience in the gaming industry and broad business network to introduce innovative, cutting-edge games and services. BigWins aims to become an entertainment hub, catering to both traditional players and an expanding audience of cryptocurrency enthusiasts.

On the other hand, the team is building an exciting, dynamic, and welcoming work environment. This serves as a high-performance engine to attract top industry professionals, including customer support agents, casino coordinators, software developers, and marketing professionals.

By partnering with leading B2B suppliers in the industry, the team can focus on what's crucial for the players. This includes offering a selection of popular, latest, and trending games, along with network promotions, loyalty programs, and bonuses.

Apart from the in-house gaming platform which is very robust and allow to add new games, payment methods and supplier in timely manager, Big Wins implemented two unique loyalty and gamification Unique Selling Points:

- BigWins Spins
- Multiplier

USP - BigWins Spins



Our brand new reward engine is integrated into our players' daily activities. Players interact with this feature when they move from one VIP level to another or when they receive exciting random drops of BigWins Spins.

It appears as a fun game that is free to spin, offering rewarding returns.

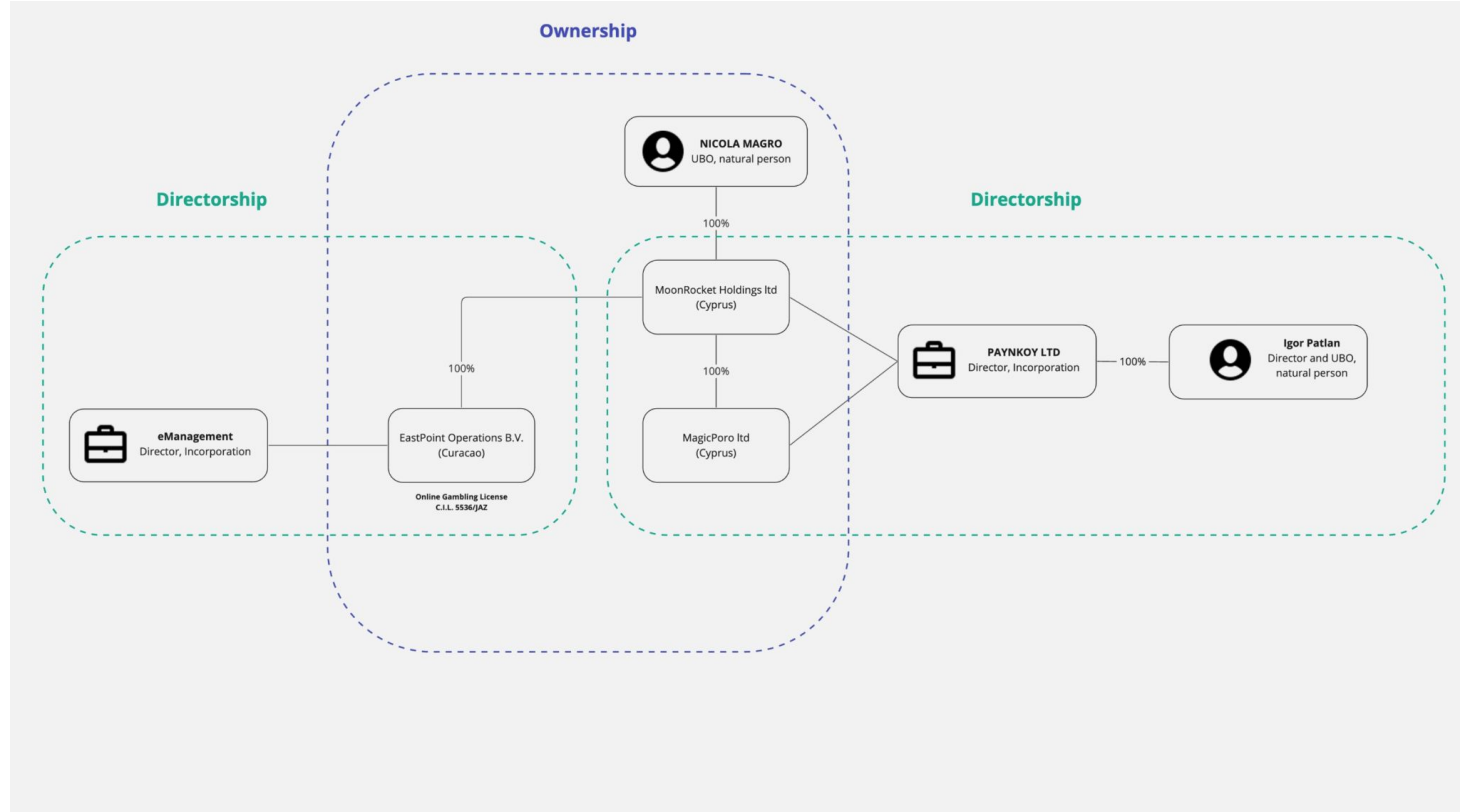
BigWins Spins are essentially a bonus tool that gives users a chance to win a random amount of Free Spins or Free Chips. This allows them to play their favorite Slots or Live Casino games.

USP - Multiplier

The Multiplier is an in-game enhancement designed to boost player engagement and excitement. It offers a chance to significantly increase winnings for a short period, adding an element of thrill. This feature also rewards frequent players, improving both player satisfaction and retention. It allows players to increase their winnings by an additional multiplier (1.5, 2, etc.) while playing their favorite games.



Group Structure



Companies - Short Overview

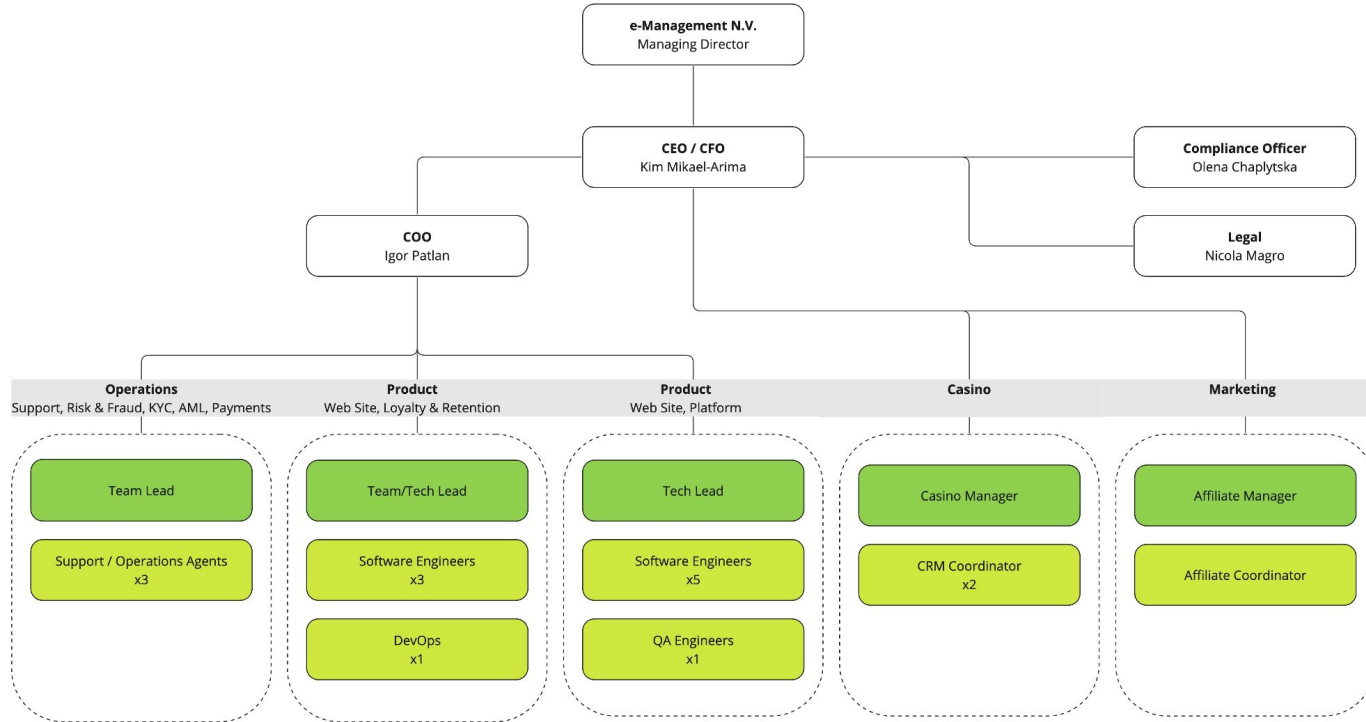
EastPoint Operations B.V. is a legal entity incorporated under the laws of Curacao on March 15, 2022. In the Commercial Register of the Curaçao Chamber of Commerce & Industry, it is registered under number 160230. The license holder was established for the purpose of obtaining a Curacao license. It is wholly owned by Moonrocket Holdings Ltd. Directorship, accounting, and other business services are handled by **e-Management B.V.** **e-Management N.V.** holds the position as the sole **managing director**, where it oversees all the operations in the organisation. The company's responsibilities under this role include strategic planning, making major corporate decisions, and managing the overall operations and resources of the company. By maintaining a comprehensive understanding of the organization, e-Management N.V. ensures that all departments work towards the company's goals and objectives in a cohesive and efficient manner.

MagicPoro Ltd is a legal entity, incorporated under the laws of Cyprus on June 2, 2022, and registered under the number HE435042. The operative company in the group. Wholly owned by MoonRocket Holdings Ltd. Incorporated in Cyprus. All operations, payments handling, and marketing activities are handled through MagicPoro Ltd. MagicPoro Ltd has a service provider agreement with EastPoint Operations BV. Operation activities included but not limited to:

- **Customer Support:** address customer complaints and inquiries.
- **Customer Verification:** perform basic KYC (ID and Address verification, Payment Method ownership), as well as EDD (SOW/SOF/SOI).
- **Risk, Fraud, Chargeback, AML, and Bonus Abuse:** identify, score risk, monitor, and prevent these activities.
- **Responsible Gambling:** identify and communicate with customers to promote responsible gaming.
- **Payment Support:** assist with failed transactions, review withdrawals, approve or reject them, and communicate with customers to request required documents or conduct verification.
- **Software Development:** develop an in-house gaming platform, extend its functionality with different game providers, payment suppliers, and unique gamification and retention features.

MoonRocket Holdings Ltd is a legal entity incorporated under the laws of Cyprus on 25th May 2022. It is registered under number HE434747. A pure holding company, which has no employees or operational activities, is established specifically to raise funds for and distribute ownership in the business. It is incorporated in Cyprus.

Management Organogram



Key Person - CEO



KIM-MIKAEL ARIMA

A startup veteran with 10 years of experience in founder and C-level roles in several different industries ranging from B2B software to clinical diagnostics.

Kimi originally joined the project as CFO in August 2022, but took over as CEO in August 2023 after the previous CEO's departure.

The bulk of Kimi's experience is in CEO/COO roles, with responsibility over strategy, business development, and finance.

Key Person - COO



IGOR PATLAN

A seasoned executive with a solid background in general management, strategic planning, and operational oversight. Specialized in payment solutions, product development, and compliance. Over 15 years of experience in the iGaming industry across various jurisdictions including Malta (MGA), UK (UKGC), Sweden (SGA), Estonia, Italy, Spain, Denmark and Isle of Man.

Igor is focusing on the company's day-to-day operations as well as website and product development.

Key Person - Compliance Officer

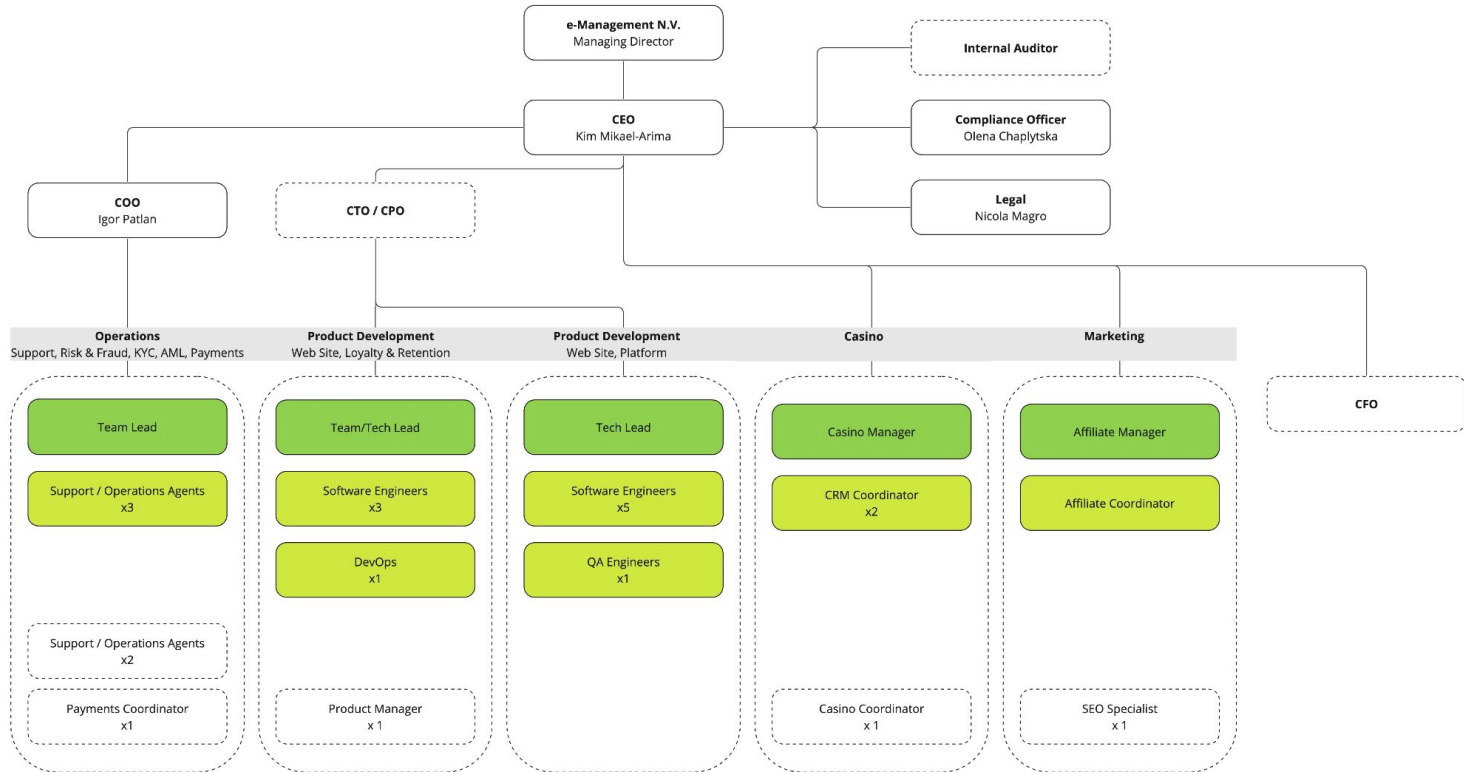


OLENA CHAPLYTSKA

Olena brings vast experience in the compliance field from both the iGaming and Banking sectors. Alongside this, she has general people management skills and project management experience from complex international projects in the iGaming industry, Big Four, specifically PWC and KPMG.

She is responsible for all matters of compliance and aids BigWins' growth in the iGaming sector by ensuring compliance.

Recruitment - Overview



Recruitment Plan - Part 1/2

BigWins has a compact and efficient team. While everyone handles several roles, we believe that assigning people to focus on specific areas could lead to better outcomes. Such approach could streamline our daily tasks and strengthen our regulations for player safety and anti-money laundering.

Our goal is to fulfil the following roles:

Internal Auditor - The sourcing process is currently underway, and we plan to fill the role within three to six months.

Product Manager - Given the number of development projects running concurrently, hiring for this role in H2 2024 would be beneficial. It would improve the software release cycle, from gathering requirements to presenting new features and functionalities to internal stakeholders, and releasing functionality to our players.

Casino Coordinator - Our game supplier's portfolio is growing and our casino team needs assistance in day-to-day business. This includes testing new games, configuring them, launching to production, and aligning communication between BigWins and game suppliers. This allows our Casino Manager to focus on more strategic and global projects.

SEO Specialist - We aim to hire an SEO specialist with a goal of acquiring at least 40-50% of all new players through direct acquisition channels via search engines. This is a long-term strategy, requiring significant preparation not only from a technical standpoint but also in terms of content creation. This position is planned to be filled sometime in 2025.

Recruitment Plan - Part 2/2

Payment Coordinator - As the number of payment transactions and solutions we offer to our players grows, we need talented individuals who can handle daily payment queries, assist developers in testing new methods, analyze the performance of each method, and suggest improvements to our cashier process. This role also serves as the primary contact point for all payment providers. We aim to add this role to our team by the end of the current year (2024).

Support/Operations Agents - we aim to utilize the latest software solutions, including AI services, to improve the efficiency of our operations teams. However, this is a gradual process, and we assess the need for additional personnel as we progress. There's a possibility that we'll hire more operational staff to focus on areas such as customer support, account verification, ongoing AML/fraud monitoring, and payment handling.

CTO / CPO - This can be a dual role at the very beginning, focusing on the overall product offering (including our gaming platform). This role aids in streamlining the development process, as well as overseeing our IT infrastructure, security, and system monitoring. We plan to fill this role in early 2025 unless we find exceptional talent beforehand and are able to hire immediately.

CFO - Currently, our CEO is performing two roles, acting as both the CEO and CFO. Once we achieve positive cash flow, we are considering bringing in a CFO as a new member of our team.

Business Forecasts - Part 1/4

	2024/04	2024/5	2024/6	2024/07	2024/8	2024/9	2024/10	2024/11	2024/12	2025/1	2025/02	2025/3
REVENUE												
finland	25,575	25,575	226,471	503,412	697,912	874,544	959,065	1,017,299	1,113,828	1,098,799	1,091,621	1,126,132
japan	37,290	57,382	80,231	104,832	132,523	164,593	198,953	235,774	275,783	318,678	364,572	412,101
TOTAL GGR	62,865	82,957	306,702	608,244	830,436	1,039,136	1,158,018	1,253,074	1,389,612	1,417,477	1,456,194	1,538,233
R&L	14,437	16,591	106,634	222,331	270,774	339,009	327,510	352,345	333,614	338,435	291,239	307,647
NGR	48,427	66,366	200,067	385,913	559,662	700,128	830,508	900,729	1,055,998	1,079,041	1,164,955	1,230,586
CPA	2,500	5,000	7,000	9,000	12,000	14,700	77,700	81,000	85,800	86,000	91,800	95,040
revshare	12,270	17,181	41,908	77,037	106,753	135,579	155,364	172,934	196,865	209,367	226,859	247,805
GSP fees	6,542	8,551	32,935	65,859	90,023	112,659	125,392	135,480	150,099	152,736	156,536	165,085
PSP fees	10,466	13,662	39,874	76,727	104,117	130,026	145,349	157,928	175,557	180,363	186,551	197,941
platform fees	10,000	15,000	15,000	18,247	24,913	30,978	33,950	36,327	39,740	40,437	41,405	43,456
license fees	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
taxes	0	0	13,588	30,205	41,875	52,473	57,544	61,038	66,830	76,916	76,413	78,829
NET CONTRIBUTION	5,650	5,972	48,762	107,838	178,982	222,712	234,209	255,022	340,106	332,223	384,391	401,430
TOTAL PAYROLL	96,065	88,065	98,565	106,065	116,065	131,165	158,236	168,736	176,736	199,636	212,371	252,371
TOTAL MARKETING	33,280	28,459	31,642	36,339	40,560	42,817	45,092	60,386	64,706	69,049	74,417	79,797
incl. CPA + revshare	48,050	50,640	80,550	122,376	159,313	193,096	278,155	314,320	347,372	364,416	393,075	422,642
TOTAL OTHER	26,200	26,800	27,400	28,000	29,100	33,200	34,300	35,400	36,500	40,600	41,700	42,800
net contribution	5,650	5,972	48,762	107,838	178,982	222,712	234,209	255,022	340,106	332,223	384,391	401,430
total costs	155,545	143,324	157,607	170,404	185,725	207,182	237,628	264,522	277,942	309,285	328,488	374,968
EBITDA	-149,895	-137,352	-108,845	-62,566	-6,743	15,530	-3,419	-9,501	62,164	22,938	55,904	26,462
interest												
taxes	0	0	13,588	30,205	41,875	52,473	57,544	61,038	66,830	76,916	76,413	78,829
cash, beginning of month	143,563	143,668	406,315	283,882	591,112	542,494	505,552	444,589	374,051	369,385	315,406	294,897
cashflow	-149,895	-137,352	-122,433	-92,770	-48,618	-36,942	-60,963	-70,538	-4,666	-53,978	-20,510	-52,367
investments in	150,000	400,000		400,000								
CASH, END OF MONTH	143,668	406,315	283,882	591,112	542,494	505,552	444,589	374,051	369,385	315,406	294,897	242,530

Business Forecasts - Part 2/4

	2025/4	2025/5	2025/6	2025/7	2025/8	2025/9	2025/10	2025/11	2025/12	2026/1	2026/2	2026/3
REVENUE												
finland	1,160,763	1,253,624	1,353,914	1,456,068	1,558,862	1,663,154	1,769,228	1,877,406	2,124,343	2,192,946	2,076,650	2,107,407
japan	460,045	508,279	557,242	609,511	664,205	720,647	779,203	840,336	903,806	969,785	1,042,775	1,120,083
TOTAL GGR	1,620,807	1,761,903	1,911,156	2,065,579	2,223,067	2,383,800	2,548,431	2,717,742	3,028,149	3,162,731	3,119,425	3,227,490
R&L	312,554	327,308	341,614	413,116	444,613	476,760	509,686	543,548	605,630	632,546	623,885	645,498
NGR	1,308,254	1,434,595	1,569,542	1,652,463	1,778,453	1,907,040	2,038,745	2,174,194	2,422,519	2,530,185	2,495,540	2,581,992
CPA	93,442	97,014	100,765	109,703	118,838	128,180	137,739	147,526	157,552	167,830	178,371	189,190
revshare	268,634	295,398	323,334	350,106	377,655	403,606	430,145	457,372	509,566	530,670	520,006	535,872
GSP fees	173,688	188,727	204,655	221,119	237,895	255,012	272,535	290,548	324,058	338,203	332,709	343,823
PSP fees	209,420	227,868	247,315	163,135	175,924	189,122	202,736	216,853	237,972	250,962	255,574	267,695
platform fees	45,520	49,048	52,779	56,639	60,577	64,595	68,711	72,944	80,704	84,068	82,986	85,687
license fees	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
taxes	81,253	87,754	94,774	101,925	109,120	116,421	123,846	131,418	148,704	153,506	145,366	147,519
NET CONTRIBUTION	435,296	487,787	544,921	648,837	697,444	749,105	802,033	856,532	962,963	1,003,945	979,529	1,011,206
TOTAL PAYROLL	256,371	279,371	288,371	299,371	307,371	319,371	329,371	333,371	333,371	338,371	342,371	355,371
TOTAL MARKETING	85,180	90,566	95,958	101,376	106,814	112,265	117,734	123,223	128,730	134,258	139,842	145,461
incl. CPA + revshare	447,256	482,979	520,057	561,185	603,306	644,051	685,618	728,121	795,848	832,759	838,219	870,523
TOTAL OTHER	43,900	45,000	46,100	47,200	48,300	52,400	53,500	54,600	55,700	56,800	57,900	59,000
net contribution	435,296	487,787	544,921	648,837	697,444	749,105	802,033	856,532	962,963	1,003,945	979,529	1,011,206
total costs	385,451	414,937	430,429	447,947	462,485	484,036	500,605	511,194	517,801	529,429	540,113	559,832
EBITDA	49,845	72,850	114,492	200,890	234,959	265,069	301,428	345,338	445,162	474,516	439,416	451,374
interest												
taxes	81,253	87,754	94,774	101,925	109,120	116,421	123,846	131,418	148,704	153,506	145,366	147,519
cash, beginning of month	242,530	211,121	196,217	215,935	314,900	440,739	589,387	766,970	980,890	1,277,347	1,598,357	1,892,408
cashflow	-31,409	-14,904	19,718	98,965	125,839	148,648	177,582	213,920	296,458	321,010	294,050	303,856
investments in												
CASH, END OF MONTH	211,121	196,217	215,935	314,900	440,739	589,387	766,970	980,890	1,277,347	1,598,357	1,892,408	2,196,263

Business Forecasts - Part 3/4

	2026/4	2026/05	2026/6	2026/7	2026/08	2026/9	2026/10	2026/11	2026/12	2027/1	2027/02	2027/3
REVENUE												
finland	2,123,921	2,127,942	2,118,168	2,107,153	2,094,849	2,081,211	2,066,189	2,049,733	2,031,793	2,012,315	1,991,246	1,968,529
japan	1,200,501	1,284,629	1,372,481	1,464,356	1,561,033	1,663,004	1,769,816	1,882,089	1,999,875	2,123,525	2,253,367	2,389,837
TOTAL GGR	3,324,422	3,412,570	3,490,649	3,571,509	3,655,883	3,744,214	3,836,005	3,931,822	4,031,668	4,135,841	4,244,613	4,358,366
R&L	664,884	682,514	698,130	714,302	731,177	748,843	767,201	786,364	806,334	827,168	848,923	871,673
NGR	2,659,537	2,730,056	2,792,519	2,857,207	2,924,706	2,995,371	3,068,804	3,145,458	3,225,334	3,308,672	3,395,690	3,486,692
CPA	200,300	211,715	223,450	235,523	247,949	260,746	273,934	287,530	301,557	316,035	330,986	346,436
revshare	549,861	562,104	572,390	583,052	594,169	605,812	617,967	630,646	643,911	657,800	672,359	687,633
GSP fees	353,681	362,536	370,247	378,222	386,537	395,234	404,262	413,680	423,485	433,707	444,374	455,522
PSP fees	279,665	291,639	303,560	316,075	329,244	343,098	357,627	372,937	389,021	405,931	423,715	442,437
platform fees	88,111	90,314	92,266	94,288	96,397	98,605	100,900	103,296	105,792	108,396	111,115	113,959
license fees	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
taxes	148,674	148,956	148,272	147,501	146,639	145,685	144,633	143,481	142,226	140,862	139,387	137,797
NET CONTRIBUTION	1,038,246	1,061,793	1,081,335	1,101,547	1,122,770	1,145,191	1,168,481	1,192,888	1,218,344	1,244,941	1,272,753	1,301,908
TOTAL PAYROLL	355,371	355,371	355,371	355,371	355,371	355,371	355,371	355,371	355,371	355,371	355,371	355,371
TOTAL MARKETING	151,104	156,777	162,480	168,215	173,988	179,804	185,659	191,557	197,499	203,488	209,527	215,619
incl. CPA + revshare	901,264	930,595	958,320	986,789	1,016,107	1,046,363	1,077,559	1,109,734	1,142,967	1,177,323	1,212,872	1,249,688
TOTAL OTHER	60,100	61,200	62,300	63,400	64,500	65,600	66,700	67,800	68,900	70,000	71,100	72,200
net contribution	1,038,246	1,061,793	1,081,335	1,101,547	1,122,770	1,145,191	1,168,481	1,192,888	1,218,344	1,244,941	1,272,753	1,301,908
total costs	566,575	573,348	580,151	586,986	593,859	600,775	607,730	614,728	621,770	628,859	635,998	643,190
EBITDA	471,671	488,445	501,184	514,561	528,911	544,416	560,752	578,160	596,574	616,082	636,755	658,719
interest												
taxes	148,674	148,956	148,272	147,501	146,639	145,685	144,633	143,481	142,226	140,862	139,387	137,797
cash, beginning of month	2,196,263	2,519,260	2,858,749	3,211,661	3,578,722	3,960,993	4,359,725	4,775,843	5,210,522	5,664,870	6,140,089	6,637,457
cashflow	322,997	339,489	352,913	367,060	382,272	398,731	416,118	434,679	454,348	475,219	497,368	520,922
investments in												
CASH, END OF MONTH	2,519,260	2,858,749	3,211,661	3,578,722	3,960,993	4,359,725	4,775,843	5,210,522	5,664,870	6,140,089	6,637,457	7,158,379

Business Forecasts - Part 4/4

SUMMARY

We focus on Japan and Finland. We will launch a new brand in Finland, under Estonian licence. We expect to reach positive EBITDA in Q3 of 2024, and positive cashflow in H1 of 2025. To get there, we will require between €500k and €1M of additional funding from our investors, for which we have solid commitments.

Once Japan becomes cash-flow positive, we might look into some Southeast Asian markets, e.g., Singapore, Malaysia, Philippines, Vietnam, Bangladesh, Thailand, depending on the market situation at the time and what opportunities are available.

Main markets

Our focus markets for the time being are Japan and Finland. The rationale for being in those markets is purely that we are familiar with the traffic sources in said markets and have access to channels and/or terms that are unavailable to the vast majority of operators.

We are aware of pending regulatory changes in Finland. We are monitoring the situation and might apply for a local licence later on, depending on how the regulatory framework turns out.

Approach in Japan

This market has significant potential, despite its slow growth trajectory.

We apply the following principles to build our brand presence and increase market share, while maintaining a high level of player loyalty (resulting in a low churn rate):

Trust & Reputation - Japan places a high emphasis on trust and reputation. Businesses place a strong emphasis on reputation and will want to know which other Japanese organizations we work with. We ensure that we are extending our business partnership with well-known and trusted partners in the industry and in the market in particular.

Local Touch - Localization and cultural sensitivity are essential. This includes local customer support, tone of voice in communication and all written materials, UX familiar to local players, local payment options, and incorporating culturally relevant themes & games.

Every Detail Matters - The Japanese audience loves detail. Landing pages have to be detailed. Expect them to look for and read company details, game reviews, etc. We are working tirelessly to improve and extend content available on our brand.

Everything Takes Time - Trust and loyalty, as well as a good local product, take time to develop and build. We are mindful of that and not expecting neither rapid growth in this market nor injecting a significant amount of marketing budget but rather take it one step at a time, adding new sources of traffic step by step and improving the visual appearance of the brands as well as provided content.

Marketing and Acquisition

Currently, our primary focus is on affiliate marketing, primarily through SEO sources, incorporating CPA, revenue share, and hybrid deals. In addition, we are establishing a social media presence for the Japanese audience through a combination of a free-to-play site and several targeted Twitter accounts, which already have over 27K followers.

After we reach positive cashflow, we will add other channels, e.g., in-house content and SEO, media buy, and brand ambassadors and sponsorships.

Target KPIs and Measurement of Success

- Registration-to-deposit conversion rate: 15%+
- FTD targets for both markets separately
- Avg deposit targets for both markets separately
- STD rate 40%+
- Cashflow positive as soon as possible

We'll look at longer-term objectives once we reach cashflow positive

Key suppliers - IT and Games

Our platform is proprietary and built from day one to be hosted in a cloud environment. Development is conducted in such a way that we can move from one cloud solution to another without much work involved, and it's a major risk mitigation factor when it comes to production IT infrastructure. Our main hosting solution is **Amazon AWS** services, which provide a great amount of out-of-the-box IT solutions. These mitigate security risk by providing a robust framework for security configuration, liveness monitoring of the servers and gaming platform, and automatic scalability to guarantee high performance of the platform during peak hours. We are also using other cloud solutions, **Vercel** (<https://vercel.com/>) and **Fly.io** (<https://fly.io/>), for our front-end (site) infrastructure to guarantee scalability, stability, and security of the solution, as well as fast delivery of the site content globally.

While our platform has capabilities to integrate with any game providers directly, we choose to integrate with reputable game aggregators **St8** (<https://st8.io/>) and **SoftSwiss** (<https://www.softswiss.com/>). This approach helps us to release new games fast and allows us to cover a wider amount of game suppliers and games as we integrated with both game aggregators in such a way that launching a new game requires more or less just a configuration and adding special features takes much less time. Our developers have a chance to focus their time more on unique propositions rather than doing transactional integration with each and every game supplier.

For a great retention tool which allows us to build a variety of different communication scenarios and retention strategies, we chose to integrate with flagship **CMS** supplier - **FastTrack** (<https://www.fasttrack-solutions.com/en>). Our cooperation with the FastTrack Team is almost daily as they keep developing features which we utilize on BigWins. They also provide great monitoring capabilities and a NOC center to make sure that communication channels with our players are up and running at any time.

Key suppliers - Payments and Banking

Payment Providers are a key element of our brand and business. Our main partner is the **Payment IQ** platform, which allows us to connect to multiple payment channels at a minimal development cost. PaymentIQ offers a wide range of payment channels, either through direct integration or other gateways. We leverage this relationship to build a robust cashier system with multiple backup payment channels. We continuously assess whether it's faster for us to add a new channel via Payment IQ, integrate directly with a payment supplier (like our crypto payment supplier CoinsPaid), or use another gateway such as our Southeast Asian payment gateway partners PayStage and Facilero.

On a day-to-day basis, we use three major banking partners:

- ISX Financial EU Ltd (Cyprus)
- Revolut Bank UAB (Lithuania)
- Payhawk (UK)

We're actively working to onboard new banking solutions like SettleDesk, Payoneer, and PayDo to ensure business continuity and cost optimization.

Risk Evaluation and Management

All external suppliers and personnel we hire undergo strict due diligence. This includes collecting company/personal documents, screenings, police conduct checks when required, background checks for adverse media, and reputation checks within our business network.

Our financial audit and legal services are provided by reputable firms with years of experience in management consulting and financial auditing. These include e-Management (Curacao), ANPK Auditors Ltd (Cyprus), KKP Auditors (Cyprus), and Gabnys.Gabniene (Lithuania). For selected topics, we seek external advice from different firms that specialize in each specific area on a case-by-case basis.

We acknowledge the need to establish an internal auditor role. We are currently in the process of setting up an internal auditor function and considering hiring an internal auditor. We are sourcing candidates and suppliers who can conduct comprehensive risk evaluations, build a risk register for the business, advise on managing these risks, build a roadmap to mitigate risk, and execute a project to step by step address the risk registry with appropriate actions. We aim to fill this position within the next 3-6 months.

Legal and Governance Framework - Part 1/2

Board Oversight and Composition

e-Management N.V., the sole director of our board, is primarily responsible for the overall management, strategic planning, and oversight of all company operations. This role ensures compliance with online gaming regulations under our Curacao license and manages the administrative responsibilities for EastPoint Operations BV. With its extensive expertise in corporate services, e-Management N.V. maintains a thorough understanding of the organization. As a result, it aligns all departments to work cohesively and efficiently towards achieving the company's goals and objectives.

Senior Management and Day-to-Day Decision Making

The day-to-day operations of BigWins are entrusted by the Board of Directors to a team of senior managers. This team is composed of the CEO/CFO, COO, Head of Casino, and IT/Software Engineering Adviser. This highly experienced and competent group is responsible for outlining the company's strategic direction, closely monitoring its financial performance, and steering its marketing strategies.

In addition, they also manage product management, customer support, and compliance, ensuring that each department is performing optimally and according to the company's vision and goals. They also oversee software development.

Regular meetings are convened on a weekly basis, or even more frequently if the situation calls for it. These meetings are crucial as they provide a platform for the team to discuss emerging challenges or opportunities, and to make decisions in a lean and responsive manner. This ensures that the company is always ready to adapt to changes and seize new opportunities, thereby ensuring its growth and success in the long term.

Legal and Governance Framework - Part 2/2

Decision-Making Process

Our company employs a dynamic decision-making process characterized by the "fail fast" philosophy. This approach allows us to experiment with different strategies on a short-term basis (ranging from a week to a month), assess outcomes, and swiftly pivot as necessary. This agility prevents deadlock and promotes continuous learning and adaptation. Legal advice is sought from internal and external advisors to inform decisions, especially when navigating complex legal and regulatory landscapes.

Legal Support and Advice

Legal support is a cornerstone of our operations, provided by a combination of internal advisors with over 15 years of experience in corporate and online gambling law and external management companies in Curacao and Cyprus. These advisors are our primary sources for legal guidance. They also provide us with a specialized legal consultants or law firms for matters beyond our in-house expertise, such as intellectual property and jurisdiction-specific gaming regulations.

Board Meetings and Participation

Board meetings are tailored to the agenda, with additional participants invited based on the topics of discussion. This could include engineering team leads for product feature launches or marketing personnel for strategy discussions. Our approach ensures that decisions are informed by a wide range of perspectives, enabling a culture of collaboration. Despite designated senior roles, we maintain a flat organizational structure to encourage open dialogue and brainstorming across all levels of the company.

Policies and Procedures - Part 1/2

Policies and Procedures Creation and Maintenance

Our COO, with vast experience in iGaming compliance across multiple jurisdictions, initially created our policies and procedures. These are continually updated in collaboration with our operational team lead and a designated Compliance Officer, focusing on areas such as customer verification, fraud prevention, AML, and responsible gaming. This ensures our practices are both current and comprehensive, leveraging internal expertise to maintain the highest standards of operational integrity.

Commitment to Regulatory Transparency with GCB

We engage with the GCB through the submission of our policies as part of our license application process and are prepared to adapt to their requirements for updates or audits. Anticipating practices similar to those in other jurisdictions, we plan to participate in annual compliance audits, share findings, and develop mitigation plans and present it to the GCB. Our goal is to create a secure environment for players and the business, adhering to all legal and regulatory frameworks.

Policies and Procedures - Part 2/2

Qualifications and Competence

Our team is not only experienced but deeply committed to the integrity and regulatory compliance of our iGaming operations. Nikola Magro, our legal advisor, brings over 15 years of expertise in iGaming law and holds a Key Function Certificate from the MGA in legal matters. Similarly, our COO, Igor Patlan, has a robust background in managing day-to-day gaming operations and is certified in this area by the MGA as well. He also brings experience from holding a UKGC PML license for a significant period. This level of expertise shows our team's proactive stance on compliance and regulation as fundamental pillars for sustainable growth.

In addition to our proactive management team, we have dedicated a specific role for overseeing compliance — our Compliance Officer. This independent role is crucial for ensuring all aspects of compliance, from license conditions to AML and player protection, are continuously met with the highest standards. The addition of an internal auditor, as we've outlined earlier, aims to further strengthen our commitment to independence in our compliance efforts. This strategy underlines our dedication to maintaining a transparent, responsible, and regulatory-compliant operation.