

Main Business / Registered Office address: Curaçao

Jurisdiction of Incorporation: Curaçao

Company / Business Registration Number Y Enterprises B.V, 158266

Y Enterprises B.V

(the Company)

Business Plan

1. Overview of the Business Products and Services/Brands:

Y Enterprise B.V. (the “Company”) is a Curaçao-based B2C gaming operator licensed by Curaçao eGaming (B2C-LL25KA7-1668JAZ) on January 11, 2022, to establish an RNG Casino and Sportsbook licensed gambling operation. The Company distinguishes itself in the industry with its innovative approach and cutting-edge offerings.

Cutting-Edge Game Content: The Company offers a diverse range of engaging and immersive game content developed using advanced technologies and creative expertise such as NetEnt, Evolution, Red Tiger, Pragmatic, Microgaming, Playtech and others.

Sports Feed Integration: In addition to its game portfolio, the Company integrates sports feeds into its platform to provide users with a comprehensive sports betting experience. Leveraging a third-party sportsbook supplied by **Altenar**, the Company offers live event coverage, Bet Builder, Player Specials, and live streaming.

Competitive Products: Y Enterprise B.V. is dedicated to delivering competitive products that meet the evolving needs and preferences of its customers. The targeted markets where Company intends to focus its efforts and services are Asia and Middle East. The company is actively evaluating potential markets with promising market value, aiming to identify lucrative opportunities for expansion and growth.

2. Company Management Structure:

The Company is led by an external executive top manager, with the owner providing strategic guidance and investment support. Key executives, including a Chief Technology Officer (CTO), Chief Operating Officer (COO), and Gaming Compliance Manager. Other relevant roles are being recruited to drive business operations as it grows.

Experience:

The business owner has successful, extensive, and relevant experience in participating in and running similar E-gaming activities as an employee, manager, and executive director in other legal entities.

3. Business Forecasts for 3 Years:

Expected Revenue:

Year 1 (2024):	Year 2 (2025):	Year 3 (2026):
\$2M	\$3M	\$4.5M

4. Overview of Intended Strategy for Business Growth:

Y Enterprise B.V. aims to capitalize on the growing demand for digital entertainment while ensuring responsible and sustainable business practices.

- **Market Forecast:** The Company anticipates steady growth in user engagement and revenue generation, driven by increasing adoption of digital platforms and evolving consumer preferences.
- **Funding Strategy:** To assist with the growth of operations, the Company will leverage personal funding and profits generated from operations. Reinvesting profits will support further growth and expansion.
- **Sustainability Plans:** The Company prioritizes operational efficiency and budgeting to ensure sound financial management and sustainable growth.
- **Excluded Markets:** Y Enterprise B.V. addresses regulatory risks by evaluating markets with particularly uncertain regulatory landscapes, thus taking proactive steps to mitigate potential challenges. This evaluation includes identifying and avoiding markets expressly prohibited under the current license terms and conditions.

5. Key Suppliers and Material Dependencies:

The Company relies on key suppliers for game content, sports feeds, and operational support. Risk management strategies are in place to address potential interruptions or losses.

Partnering with reputable PLCs in the gaming industry renowned for their expertise in developing high-quality and engaging casino games.

Collaborating with leading software providers that offer robust solutions for managing casino platforms, ensuring seamless gameplay and regulatory compliance.

Developing robust business continuity plans to mitigate the impact of supplier-related disruptions and ensure uninterrupted operations.

Obtaining appropriate insurance coverage to mitigate financial losses resulting from supplier-related disruptions and other unforeseen events.

6. Risk Evaluation and Management:

Effective risk management is essential for the Company's success. Internal and external audits, oversight committees, and risk registers are to be employed to proactively manage risks and ensure compliance.

- **Internal Business Audit:**

The Company intends to conduct regular internal audits of our business processes and operations to identify potential risks and inefficiencies.

Internal audits are to be carried out by qualified professionals who review key areas such as operational procedures, compliance with policies and regulations, and internal controls. Findings from internal audits are documented and shared with relevant stakeholders for corrective action and process improvement.

- **External Business Audit:**

In addition to internal audits, we intend to engage external auditors to provide an independent assessment of our business practices and financial performance.

External audits are conducted by reputable audit firms with expertise in our industry and regulatory requirements.

The audit scope includes financial statements, regulatory compliance, risk management practices, and adherence to industry standards.

- **Finance Audit:**

Finance audits focus on evaluating financial controls, accounting practices, and compliance with financial regulations.

Audit findings are used to identify areas for improvement and strengthen financial controls to mitigate risks of fraud, errors, and financial misstatements.

- **Oversight Committees:**

We establish oversight committees comprised of senior executives and independent board members to provide governance and oversight of key business functions.

Oversight committees meet regularly to review audit findings, assess risks, and provide strategic guidance on risk mitigation strategies.

Committee members bring diverse expertise and perspectives to the table, ensuring thorough analysis and decision-making.

- **Risk Registers:**

We maintain comprehensive risk registers that document identified risks, their potential impact, and mitigation strategies.

Risks are categorized based on severity and likelihood, allowing us to prioritize mitigation efforts and allocate resources effectively. Some of the key Risks to be considered are as follows:

Regulatory Compliance Risks, Legal Risks, Cybersecurity Risks, Fraud and Money Laundering Risks, Financial Risks, Technological Risks.

7. Legal and Governance Framework:

The Company has established a legal and governance framework to ensure compliance with laws, regulations, and ethical standards. Internal and external legal advisors support operations, and policies are in place to guide conduct.

- **Internal Legal Advisor:**

Our organization appoints an internal legal advisor to oversee legal matters and provide guidance to company stakeholders.

The internal legal advisor is responsible for handling day-to-day legal issues, drafting contracts and agreements, conducting legal research, and advising on compliance matters.

They serve as a central point of contact for legal inquiries and collaborate closely with other departments to address legal concerns promptly and effectively.

- **Engagement of External Advisors:**

In addition to the internal legal advisor, our company utilizes external legal advisors to supplement internal expertise and address specialized legal needs.

External advisors are engaged based on their expertise, experience, and suitability for specific legal matters or projects.

They provide independent legal analysis, advice, and representation as required, enhancing the depth and breadth of our legal capabilities.

- **Compliance and Regulatory Oversight:**

Our legal and governance framework prioritizes compliance with relevant laws, regulations, and industry standards.

The internal legal advisor monitors changes in legal and regulatory requirements, assesses their impact on company operations, and recommends necessary adjustments to ensure compliance.

Oversight committees may be established to provide governance and oversight of compliance-related matters, fostering accountability and transparency in regulatory matters.

- **Documentation and Record-Keeping:**

We maintain meticulous records of legal documentation, including contracts, agreements, policies, and correspondence.

All legal documents are stored securely and accessible to authorized personnel for reference and review.

Document management practices adhere to industry best practices and regulatory requirements to ensure accuracy, confidentiality, and integrity of legal records.

- **Training and Awareness:**

Our organization invests in ongoing training and awareness programs to promote legal literacy and ethical conduct among employees.

Training sessions cover topics such as legal responsibilities, compliance obligations, data privacy, and ethical decision-making.

Employees are encouraged to seek guidance from the internal legal advisor or external legal counsel when faced with legal or ethical dilemmas in the course of their work.

8. Target KPIs and Business Objectives:

The Company measures success through key performance indicators (KPIs) such as user engagement, revenue growth, and regulatory compliance. Long-term objectives include market expansion and customer satisfaction.

9. Policies and Procedures:

Policies encompass AML, KYC, general terms and conditions, responsible gambling, and privacy. These policies ensure regulatory compliance and promote transparency and user trust.

By adhering to this business plan, Y Enterprise B.V. aims to establish itself as a leading player in the online gambling industry, driving sustainable growth and delivering exceptional value to its users.

- **Anti-Money Laundering (AML) Policy:** Our AML policy outlines measures to prevent our platform from being used for illicit financial activities such as money laundering and terrorist financing. It includes procedures for customer due diligence, monitoring transactions for suspicious activities, and reporting requirements to regulatory authorities.

- **Know Your Customer (KYC) Policy:** The KYC policy mandates the collection and verification of customer information to confirm their identity and assess their risk profile. By implementing robust KYC procedures, we aim to mitigate the risk of fraud, identity theft, and unauthorized access to our platform.

- **General Terms and Conditions:** Our general terms and conditions establish the contractual relationship between our company and its users, setting forth the rights, responsibilities, and obligations of both parties. These terms cover various aspects such as user registration, account management, payment processing, dispute resolution, etc.

- **Responsible Gambling Policy:** In addition to regulatory requirements, we are committed to promoting responsible gambling practices among our users. Our responsible gambling policy includes measures to prevent underage gambling, provide support and resources for individuals affected by gambling addiction, and facilitate self-exclusion and limit-setting options for users.

- **Privacy Policy:** Our privacy policy governs the collection, use, and disclosure of personal information collected from users. It outlines our commitment to protecting user privacy, the purposes for which personal data is processed, and the rights of individuals regarding their personal information.

As a responsible Operator, we have dedicated personnel that will be at hand and keep the GCB updated within the specified timeframes for any requests. Additionally, we proactively manage our license obligations, ensuring immediate communication of any significant operational and/or material changes.

We have extensive experience across our company and the responsible persons producing and writing our policies are both qualified for this role with Legal and Compliance backgrounds. They also hold external qualifications and certification.

Our team consistently stays informed about the latest developments and best practices in responsible gambling, anti-money laundering (AML)/counter-terrorism financing (CTF), and data protection to ensure our policies remain current and effective. The individuals responsible for developing and maintaining our policies possess extensive qualifications and expertise in legal and compliance matters. Additionally, they hold external certifications and qualifications that further enhance their competence in these areas.

Date: March 20, 2024

Full Name: Shalom Shlomi Yona

Signature: 