

# Medial N.V.

## Business Plan.

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## **Executive summary**

Medial N.V. is focused on expanding its user base worldwide by strategically entering targeted markets. Medial N.V. will commence its marketing efforts in the Europe markets, gradually extending to other regulated regions. The diverse portfolio of games offered by Medial N.V. caters to a broad audience, without specific client target groups in mind.

Based on our projections, Medial N.V. anticipates achieving profitability by 2025, assuming the company receives the necessary license from the Gaming Control Board (GCB). To establish a strong presence in the market, Medial N.V. will launch multiple casino brand websites.

Medial N.V. provides an extensive range of gaming options to its clients, including live table games, casino games, slots, and sports betting. In addition to serving players directly, Medial N.V. also offers software solutions for B2C operations.

The target market for Medial N.V. is global, apart from countries prohibited by the GCB. Committed to complying with regulatory requirements, Medial N.V. aims to capture a wide customer base and establish a robust presence in the international gaming industry.

## **Business Summary and History**

Medial N.V., a company incorporated under the laws of Curacao, currently holds the Curacao sub-license and intends to apply for the gaming license with the GCB in accordance with the newly introduced legislation.

## **Vision and Mission**

Our vision of Medial N.V. is to build a world – class online gambling website solution that can compete with the leading international brands. Medial N.V. would like to provide the best customer gambling experience.

We believe that gambling is an entertainment medium, and it is our philosophy to build a friendly usability platform that automatically morphs around players' behavior.

## **Why Curacao?**

Medial N.V. is determined that by acquiring a Curacao Gaming License, the company will enhance its competitive advantage in the iGaming Market, and this will open new doors to new and potential business. Apart from the internal competitive advantage – made up of an experienced and young dynamic team, the Curacao license will offer an external competitive advantage, summarised as:

- Curacao being a jurisdiction of great repute in the iGaming world;
- Curacao was the first country to regulate iGaming;
- Excellent hosting infrastructure;
- Competitive corporate tax rate.

Curacao is positioned as one of the leading destinations for iGaming operators, benefiting from its extensive regulatory framework. With the GCB recent overhaul of regulations, we strive to be at the

forefront of pioneering new industry standards. Medial N.V. is well-positioned to take advantage of being among the first to obtain these licenses.

### **What is Medial N.V.?**

Medial N.V. is a comprehensive gambling platform that not only provides a wide range of games for players but also offers game software solutions to B2C operators. Our platform creates a secure and enjoyable environment where players can connect with fellow casino and sports enthusiasts. Our diverse offerings cover popular sports such as soccer, tennis, basketball, and other major sporting events.

Our primary objective is to cultivate an active and engaged community, allowing players to both watch and participate in various games and events. As a dedicated team, we prioritize effective communication on all fronts, including deep insights provided by analysts where relevant and required.

We take pride in our unique sales proposition, which includes round-the-clock customer care service, ensuring that our players receive prompt assistance whenever needed. Additionally, we prioritize instant withdrawals to provide a hassle-free and efficient experience. Our platform is designed to be mobile-friendly, allowing players to access games and betting options conveniently from their smartphones. We offer welcome bonuses and ongoing promotions to enhance the overall gaming experience, and a loyalty program will soon be launched to automatically reward our valued players.

Furthermore, our platform supports multiple languages, catering to a diverse global audience. This ensures that players can engage with Medial N.V. in their preferred language, enhancing accessibility and user experience.

In summary, Medial N.V. is a comprehensive gambling platform that not only offers an extensive range of games for players but also provides game software solutions to B2C operators. With our focus on popular sports, active community engagement, exceptional customer care, instant withdrawals, mobile-friendly interface, enticing bonuses, and multi-language support, we aim to deliver a top-notch gaming experience to all our valued users.

### **Why Medial N.V. is applying for an GCB License**

The decision to apply for a full license with the GCB stems from Medial N.V.'s commitment to compliance with evolving regulatory standards and ensuring the longevity and credibility of its operations. Currently holding a sublicense under Master licensor Gaming Provider Services N.V., Medial N.V. recognizes the importance to transition to a new license to align with new regulatory mandates and maintain a competitive edge in the dynamic iGaming industry.

The iGaming landscape has witnessed exponential growth since the 1990s, attracting a surge of operators seeking to capitalize on emerging markets. Curacao stands out as an appealing destination for iGaming companies, offering a sensible regulatory framework for remote gaming operations. Key reasons for selecting Curacao include:

- **Regulatory Soundness:** Curacao is one of the few jurisdictions that regulate remote gaming in a comprehensive and judicious manner. This regulatory approach ensures the protection of both operators and players, fostering trust and confidence in the online gaming ecosystem.
- **Reputable Jurisdiction:** Online gaming operations in Curacao benefit from a reputation for being

conducted within a well-regulated jurisdiction. This reputation enhances the credibility of operators and instills trust among global players, contributing to sustained growth and market expansion.

- **Favorable Fiscal Environment:** Curacao offers an attractive fiscal regime for gaming companies, providing incentives for investment and business growth. This favorable tax framework encourages innovation and entrepreneurship within the iGaming sector, fostering economic prosperity and job creation.
- **Efficient Licensing Process:** The process of obtaining a Curacao gaming license is streamlined and relatively cost-effective compared to other jurisdictions. This efficiency facilitates timely market entry for operators, enabling them to capitalize on emerging opportunities and gain a competitive foothold in the global gaming market.

## **Market analysis Summary**

The online gaming market is rapidly expanding, becoming a significant segment within the gambling industry. As customers increasingly turn to the Internet for sports betting, slot games, and card playing, the traditional gambling model is evolving. Despite potential political and legislative constraints, the market shows potential for further growth as new regions open up and governments become more accepting of online gambling. The global growth of professional sports and associated betting markets, driven by technological advancements and consumer demand, mutually benefits both industries financially.

The iGaming industry is constantly evolving, requiring gaming operators to adapt to new developments in the market. Many countries are pursuing self-regulation approaches to ensure player protection and generate tax revenue from gaming activities. The industry continues to expand at a rapid pace, with new operators seeking market shares in their respective countries.

## **Market Segmentation**

The global online gambling industry is experiencing robust growth across multiple regions, with different regions assuming leadership positions. Currently, the Asia-Pacific region dominates as the largest market, closely pursued by North America. However, recent data signifies a notable evolution in the industry landscape, showcasing Europe as the third-largest expanding online gambling market.

Driving this expansion is the substantial legislative transformation witnessed in North America, particularly in the United States. As restrictions on online gambling gradually loosen in specific sectors and areas, the market is witnessing a remarkable surge in growth. This presents abundant opportunities for iGaming operators to capitalize on the expanding North American market.

Moreover, South America has emerged as a promising region within the global online gambling market. Recent trends reveal a significant escalation in online gambling activities and an expanding customer base across various South American countries. Improved internet infrastructure and increased accessibility to mobile devices have played a pivotal role in fueling the growth of this thriving market.

Although still developing, the South American market holds immense potential for iGaming operators. As regulatory frameworks gradually take shape, the region is becoming increasingly conducive for online gambling operations. This evolving landscape attracts industry players seeking to tap into the growing

demand for online gambling entertainment in South America.

The inclusion of South America further solidifies the global nature of the online gambling industry. While the Asia-Pacific region remains the largest market, Europe continues its upward trajectory as a significant expanding market. Concurrently, ongoing legislative shifts in North America also contribute to the industry's overall momentum.

To thrive in the evolving global online gambling market, iGaming operators must adapt, maintain agility, and strategically position themselves to leverage changing market dynamics. By staying attuned to emerging opportunities and following industry trends closely, operators can maximize their potential for success in the diverse and dynamic online gambling landscape. This includes targeting the promising markets of South America, alongside the established markets of North America, Europe, Asia-Pacific, and the growing potential of Middle Eastern and African countries.

### **Target Market Segment Strategy**

Medial N.V. employs a strategic approach to target market segments, leveraging insights into global online gambling trends and regulatory landscapes. The company's segmentation strategy focuses on reaching diverse geographic regions while complying with regulatory requirements and catering to specific audience preferences. Key elements of Medial N.V.'s target market segment strategy include:

- **Global Reach:** Medial N.V. targets a global audience, excluding countries prohibited by regulatory bodies like the GCB. This approach allows the company to tap into diverse markets with varying levels of demand for online gambling services.
- **Regulatory Compliance:** Prioritizing adherence to regulatory standards, Medial N.V. strategically enters markets with established regulatory frameworks, ensuring legal compliance and mitigating risks associated with operating in unregulated jurisdictions.
- **Market Prioritization:** The company initially targets European markets due to their robust regulatory frameworks and high demand for online gambling services. As Medial N.V. establishes a strong presence in Europe, it plans to expand gradually into other regulated regions, optimizing resources and minimizing market entry risks.
- **Diverse Portfolio:** Medial N.V.'s diverse portfolio of games caters to a broad spectrum of player preferences, including live table games, casino games, slots, and sports betting. This comprehensive offering allows the company to appeal to a wide range of players, enhancing market penetration and revenue potential.
- **Customized Solutions:** In addition to serving players directly, Medial N.V. provides tailored software solutions for B2C operators, enabling them to launch and manage online gambling platforms efficiently. By offering customizable solutions, the company addresses the unique needs of different operators, fostering long-term partnerships and revenue streams.
- **Customer-Centric Approach:** Medial N.V. prioritizes customer satisfaction and engagement, offering round-the-clock customer support, instant withdrawals, enticing bonuses, and a user-friendly interface. By delivering an exceptional gaming experience, the company aims to build brand loyalty and attract a loyal customer base across target markets.
- **Multilingual Support:** Recognizing the importance of language diversity, Medial N.V.'s platform supports multiple languages, ensuring accessibility for players worldwide. This localization strategy enhances user experience and facilitates engagement with diverse customer segments,

regardless of geographical location or linguistic preferences.

Overall, Medial N.V.'s target market segment strategy is characterized by a global outlook, regulatory compliance, market prioritization, diverse offerings, customized solutions, customer-centricity, and multilingual support. By effectively executing this strategy, the company aims to establish a strong presence in the international online gambling industry and achieve sustainable growth and profitability.

### **Target Market Finance Strategy**

Medial N.V.'s finance strategy for target markets encompasses prudent financial management practices aimed at optimizing revenue streams, managing costs, and mitigating financial risks. Key elements of the finance strategy include:

- **Revenue Diversification:** To reduce reliance on specific revenue streams and enhance financial resilience, Medial N.V. adopts a diversified revenue approach. This involves offering a wide range of gaming products and services to cater to diverse player preferences and market segments. By diversifying revenue sources, the company mitigates the impact of fluctuations in individual markets and maximizes revenue potential.
- **Market Entry Analysis:** Before entering new markets, Medial N.V. conducts thorough financial analysis to assess market potential, regulatory requirements, and competitive dynamics. This analysis helps identify market entry costs, revenue projections, and potential financial risks, enabling informed decision-making and resource allocation.
- **Cost Optimization:** Medial N.V. employs cost optimization strategies to streamline operational expenses and improve profitability. This includes implementing efficient processes, leveraging technology to automate tasks, negotiating favorable vendor agreements, and minimizing overhead costs without compromising on quality or customer experience.
- **Financial Compliance:** Ensuring compliance with regulatory requirements and financial standards is paramount for Medial N.V.'s finance strategy. The company allocates resources to maintain adherence to licensing obligations, tax regulations, anti-money laundering (AML) protocols, and other financial compliance measures. This commitment to regulatory compliance safeguards Medial N.V.'s reputation, minimizes legal risks, and fosters trust among stakeholders.
- **Financial Controls:** Medial N.V. implements robust financial controls and reporting mechanisms to monitor revenue, expenses, and cash flow effectively. This includes periodic financial audits, internal controls, and risk assessments to identify and mitigate financial irregularities or discrepancies promptly. By maintaining transparency and accountability in financial operations, Medial N.V. enhances investor confidence and strengthens financial governance.
- **Strategic Investments:** Medial N.V. strategically allocates capital for investments in technology, marketing, customer acquisition, and expansion initiatives. These investments aim to drive long-term growth, enhance competitive advantage, and capitalize on emerging market opportunities while maintaining financial discipline and risk management principles.
- **Financial Partnerships:** Medial N.V. collaborates with reputable financial institutions, payment service providers (PSPs), and strategic partners to facilitate secure and efficient financial transactions. By partnering with trusted PSPs, the company ensures seamless payment processing, fraud prevention, and customer convenience, enhancing the overall gaming experience and fostering customer loyalty.

Overall, Medial N.V.'s target market finance strategy focuses on revenue diversification, market entry analysis, cost optimization, financial compliance, controls, strategic investments, and financial partnerships. By executing this comprehensive finance strategy, the company aims to achieve sustainable growth, financial stability, and market leadership in the global online gaming industry.

### **Who are the key suppliers and material dependencies?**

Medial N.V. relies on several key suppliers and material dependencies to support its operations and deliver gaming products and services to customers. These suppliers and dependencies include:

- **Games and Platform Provider:** Dataswapp Solutions Limited, a Seychelles entity, serves as the primary supplier of gaming content and platform solutions for Medial N.V. . The company provides a diverse portfolio of games, including live table games, casino games, slots, and sports betting options, as well as the underlying platform infrastructure for hosting and managing gaming operations.
- **Payment Service Providers (PSPs):** Medial N.V. collaborates with multiple PSPs to facilitate secure and efficient payment processing for its gaming platform. Examples of PSPs include (but not limited to):

Nuvei: A reputable payment processor that provides businesses with more than 600 alternative, pay-in and payout options.

TAU: A cutting-edge white-label payment software provider that allows customers to make payments securely using various methods such as Visa, Master Card, Maestro, ApplePay etc.

Centrobill: A global payment gateway for all aspects of high-risk payment processing and banking integration which successfully connects many Credit Card Acquirers, Payment Service Providers and Alternative Payment Methods with a single platform and a single API.

Eupago: A payment solution that offers fast and secure money transfers, enabling customers to fund their gaming accounts conveniently.

These PSPs play a crucial role in facilitating deposits, withdrawals, and other financial transactions on Medial N.V.'s platform, enhancing the overall user experience and ensuring compliance with regulatory requirements.

### **SWOT Analysis**

#### **Strengths:**

- **Diverse Gaming Portfolio:** Medial N.V. offers a wide range of gaming options, including live table games, casino games, slots, and sports betting, catering to diverse player preferences and increasing market penetration.
- **Regulatory Compliance:** The company prioritizes adherence to regulatory standards, holding a sublicense under Curacao jurisdiction and aiming to transition to a full license with the GCB. This commitment enhances credibility, fosters trust among players, and ensures legal compliance.
- **Strategic Market Expansion:** Medial N.V. focuses on expanding its user base globally, initially targeting European markets with plans for gradual expansion into other regulated regions. This strategic approach capitalizes on emerging market opportunities while mitigating regulatory risks.
- **Customer-Centric Approach:** Medial N.V. emphasizes customer satisfaction, offering round-the-

clock customer support, instant withdrawals, enticing bonuses, and a user-friendly interface. This customer-centric approach enhances player engagement, fosters loyalty, and drives revenue growth.

#### Weaknesses:

- **Dependence on Suppliers:** Medial N.V. relies on key suppliers, including Dataswapp Solutions Limited for gaming content and platform solutions. Dependency on external suppliers poses risks related to quality control, service disruptions, and pricing fluctuations, potentially impacting operations.
- **Transition to GCB License:** The process of transitioning from a sublicense to a full license with the GCB entails regulatory hurdles, administrative complexities, and potential delays. This transition period may disrupt operations and hinder market expansion efforts.

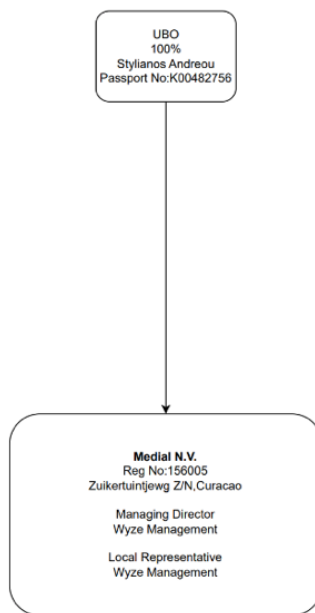
#### Opportunities:

- **Global Market Expansion:** The online gambling market is experiencing rapid global expansion, driven by increasing internet penetration, shifting regulatory landscapes, and growing consumer demand. Medial N.V. has opportunities to capitalize on emerging markets and diversify revenue streams.
- **Technological Innovation:** Advancements in technology, such as mobile gaming, virtual reality, and artificial intelligence, present opportunities for Medial N.V. to enhance gaming experiences, attract new players, and differentiate its offerings in a competitive market landscape.

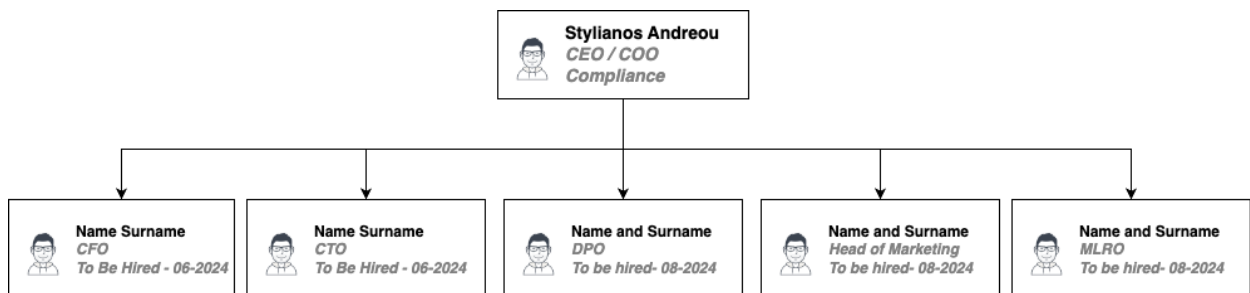
#### Threats:

- **Regulatory Risks:** Regulatory changes, compliance requirements, and licensing uncertainties pose threats to Medial N.V.'s operations and market expansion plans. Changes in regulatory frameworks, particularly in key markets, could impact profitability and disrupt business continuity.
- **Competitive Landscape:** Intense competition within the online gambling industry, characterized by established incumbents and new entrants, poses threats to Medial N.V.'s market share, pricing strategies, and customer acquisition efforts. Competitors may offer similar or superior gaming products, leading to customer churn and revenue loss.
- **Cybersecurity Risks:** The online gaming industry is vulnerable to cybersecurity threats, including data breaches, hacking attempts, and malware attacks. Cybersecurity risks pose threats to player privacy, financial transactions, and brand reputation, necessitating robust security measures and risk mitigation strategies.

#### **Company shareholding structure**



## Organizational plan



## Key personnel and key functions' competence

### Chief Executive Officer (CEO) / Chief Operating Officer (COO)/ Compliance

Stylianos Andreou has been working in the igaming industry over 10 years and is one of the partners in the establishment of Medial N.V. . He has very strong connections in the industry and a deep analytical mindset with highly resourceful skills. He worked in various leading companies covering senior areas and can adapt his knowledge and management talents into his new venture. He has experience in managing and growing highly efficient teams and making strategic decisions for complicated and costly projects.

Responsible for:

- Develop, implement, and enforce compliance policies and procedures.
- Monitor and assess the organization's adherence to relevant laws and regulations.
- Conduct regular compliance risk assessments.
- Provide guidance to employees on compliance matters and conduct training programs.
- Investigate and address reported compliance concerns or violations.
- Collaborate with other departments to ensure consistent compliance practices.

- Stay informed about changes in laws and regulations affecting the industry.
- Establish and maintain effective communication channels for reporting compliance issues.
- Conduct periodic internal audits to assess and improve compliance programs.
- Interact with regulatory authorities and respond to inquiries or audits.
- Evaluate and approve business practices to ensure compliance.
- Design and implement systems for monitoring and reporting compliance metrics.
- Develop and update compliance manuals, codes of conduct, and related documents.
- Oversee the implementation of compliance-related technology solutions.
- Provide regular compliance reports to senior management and the board.
- Ensure that the organization's policies align with ethical standards and industry best practices.
- Participate in the development of risk management strategies.
- Collaborate with legal counsel to address complex compliance issues.
- Lead the response to regulatory changes and ensure timely updates to policies.
- Maintain records and documentation related to compliance activities.
- Act as a point of contact for employees seeking guidance on compliance matters.

#### **Chief Financial Officer (CFO) – To be hired**

Responsible for:

- Develop and manage the organization's financial strategy and policies.
- Oversee financial planning, budgeting, and forecasting processes.
- Manage and optimize the organization's capital structure.
- Ensure accurate and timely financial reporting.
- Supervise accounting functions, including accounts payable and receivable.
- Implement and maintain effective internal controls.
- Assess and manage financial risks.
- Conduct financial analysis and provide insights to support decision-making.
- Liaise with external auditors and ensure compliance with accounting standards.
- Manage relationships with financial institutions and stakeholders.
- Evaluate and oversee investment strategies.
- Monitor cash flow and liquidity.
- Lead financial negotiations and agreements.
- Provide leadership and guidance to the finance team.
- Participate in strategic planning and decision-making processes.
- Stay informed about changes in financial regulations and industry trends.
- Develop and implement cost-saving initiatives.
- Evaluate and recommend financial technologies for improved efficiency.

#### **Data Protection Officer (DPO) – To be hired**

Responsible for:

- Oversee and ensure compliance with data protection laws and regulations.
- Develop, implement, and manage data protection policies and procedures.
- Conduct regular data protection impact assessments.
- Provide guidance and training to employees on data protection matters.
- Respond to and manage data subject access requests.
- Monitor data processing activities for compliance with privacy policies.
- Collaborate with other departments to embed privacy by design principles.
- Stay informed about changes in data protection laws and industry standards.
- Act as the point of contact for data protection inquiries and concerns.

- Work with IT and security teams to implement and maintain data security measures.
- Conduct audits to assess and improve data protection practices.
- Ensure that data processing agreements and contracts comply with data protection requirements.
- Collaborate with legal counsel to address complex data protection issues.
- Oversee and manage data breach response and notification procedures.
- Maintain records and documentation related to data protection activities.
- Assist in the development of privacy impact assessments for new projects.
- Coordinate with external regulators and authorities on data protection matters.
- Provide reports on data protection compliance to senior management and the board.
- Monitor and assess third-party data processing activities for compliance.
- Implement processes for managing data retention and deletion.
- Act as a liaison between the organization and data protection authorities.

#### **Chief Technical Officer (CTO) – To be hired**

Responsible for:

- Lead technology strategy and innovation.
- Oversee the development and implementation of IT policies and procedures.
- Manage the organization's technology infrastructure.
- Ensure data security and compliance with relevant regulations.
- Supervise software and hardware development teams.
- Evaluate and implement technology solutions for business efficiency.
- Collaborate with other departments to align technology with business goals.
- Provide leadership and guidance to the IT department.
- Assess and manage technology-related risks.
- Stay informed about emerging technologies and industry trends.
- Plan and execute technology projects within budget and timeline.
- Liaise with external vendors and partners.
- Manage relationships with technology service providers.
- Lead disaster recovery and business continuity planning.
- Collaborate with cybersecurity teams to enhance digital security.
- Participate in strategic planning and decision-making processes.
- Conduct technology-related training programs for staff.
- Ensure IT support services are efficient and responsive.
- Coordinate with legal and compliance teams on technology-related matters.
- Develop and maintain IT budgets and financial forecasts.
- Promote a culture of innovation and continuous improvement within the IT department.
- Evaluate and recommend technology investments for the organization.
- Maintain documentation of technology systems and processes.
- Act as a point of contact for technology-related inquiries and concerns.

#### **Money Laundering Reporting Officer (MLRO) – To be hired**

Responsible for:

- Develop, update, and implement AML policies and procedures.
- Conduct risk assessments to evaluate money laundering and terrorist financing risks.
- Provide training and awareness programs for employees on AML policies and procedures.
- Oversee customer due diligence (CDD) processes, ensuring proper identification and verification.
- Implement systems for monitoring transactions and promptly report suspicious activities.

- Act as the point of contact for employees reporting suspicious transactions.
- Maintain comprehensive records of customer transactions and AML-related activities.
- Monitor and assess the effectiveness of the organization's AML program.
- Recommend improvements to the AML program as needed.
- Serve as the primary contact for regulatory authorities on AML compliance matters.
- Respond to regulatory inquiries and provide necessary documentation.
- Regularly report to senior management and the board on AML compliance status.
- Stay informed about changes in AML laws, regulations, and industry best practices.
- Establish and manage a confidential reporting mechanism for whistleblowers.
- Collaborate with other departments, such as legal, compliance, risk management, and internal audit.
- Conduct periodic reviews and audits of the AML program for improvement and ongoing compliance.
- Ensure adherence to international AML standards and recommendations.
- Work with the IT department to integrate advanced technology solutions for AML monitoring and reporting.

#### **Head of Marketing – To be hired**

Responsible for:

- Formulate comprehensive marketing strategies aligned with company goals, market trends, and target audience preferences. Identify key market segments, positioning strategies, and competitive differentiation to drive brand growth and market share. Brand Management
- Oversee brand development and ensure consistent brand messaging across all channels and touchpoints. Manage brand positioning, brand identity, and brand perception to enhance brand equity and customer loyalty.
- Lead digital marketing initiatives encompassing SEO, SEM, email marketing, social media marketing, and content marketing. Utilize data analytics and customer insights to optimize digital campaigns, drive website traffic, and generate leads.
- Implement retention strategies to nurture existing customer relationships and drive repeat business. Develop loyalty programs, personalized marketing initiatives, and customer engagement campaigns to enhance customer satisfaction and lifetime value.
- Conduct market research and competitive analysis to identify market trends, customer preferences, and competitive threats. Utilize market insights to inform marketing strategies, product development, and business decisions.
- Identify strategic partnerships, sponsorships, and collaborations to enhance brand visibility and reach new audiences. Negotiate partnership agreements, manage vendor relationships, and maximize co-marketing opportunities.
- Ensure marketing activities comply with legal and regulatory requirements, including advertising standards, data privacy regulations, and industry guidelines. Collaborate with legal and compliance teams to mitigate risks and maintain brand integrity.

#### **Risk Evaluation Process**

Medial N.V. places a strong emphasis on effective risk management, following a comprehensive Risk Management Model outlined in the dedicated Risk Management Policy document. The Board of Directors and C-level Management, as key stakeholders, play a crucial role in overseeing and approving changes to this policy. Any adjustments to operating procedures, standards, guidelines, and technologies, consistent with the policy, may be authorized by the Chief Executive Officer.

The Board of Directors has the authority to approve the policy and undertakes annual reviews for ongoing

merit. C-level Management is tasked with implementing and administering the directives in accordance with the approved policy. The Chief Executive Officer, along with all employees, bears the primary responsibility for enforcing the policy and its operating procedures.

Importantly, the policy and its procedures do not contravene or supersede any other legal or regulatory requirements imposed on Medial N.V. .

Medial N.V. advocates for effective communication, transparency, and active participation from all key stakeholders in its model risk governance. This includes the encouragement of effective challenges to model-related processes, such as risk analysis, validation, testing, development, and governance. The Board of Directors, Chief Executive Officer, and Senior Management are tasked with fostering an environment conducive to such challenges.

Appropriate change management processes are integral to model governance, particularly when implementing or altering models and related technologies. These processes cover various areas, including model development, personnel, policies, testing and validation, IT systems, regulatory requirements, and internal controls. Medial N.V. may engage third-party experts with specialized technology knowledge to ensure effective third-party risk management.

Meeting minutes from the Board of Directors serve as evidence of proper oversight of model risk management. These minutes are meticulously documented, providing sufficient information to demonstrate that the Board of Directors and Chief Compliance Officer are fully informed about relevant facts, comprehend associated risks, deliberate on significant issues, independently make decisions in Medial N.V.'s best interests, and approve prior meeting minutes. This diligent approach ensures accountability and transparency in the company's model risk management practices and places a strong emphasis on effective risk management, following a comprehensive Risk Management Model outlined in the dedicated Risk Management Policy document. The Board of Directors and C-level Management, as key stakeholders, play a crucial role in overseeing and approving changes to this policy. Any adjustments to operating procedures, standards, guidelines, and technologies, consistent with the policy, may be authorized by the Chief Executive Officer.

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## **Legal Framework**

Decisions pertaining to the Risk Management Policy and Model at Medial N.V. are exclusively within the purview of the esteemed Board of Directors and C-level management. The governance structure ensures a clear delineation between major strategic decisions and day-to-day operations. The latter, aligned with the Risk Management Policy and other board-approved policies such as KYC, AML, and Compliance, is the responsibility of the C-level management.

To prevent potential deadlock situations, the CEO holds the controlling vote in the event of a tie among the four C-level management members, providing a decisive mechanism for swift decision-making.

The C-level management, as a practice, diligently updates the Board of Directors on significant business developments during quarterly board meetings, facilitating a seamless flow of information between the top-tier executives and the governing body.

Legal support and advice form a crucial component of Medial N.V.'s decision-making processes. The company engages multiple corporate service providers and legal firms, each chosen based on their jurisdictional expertise relevant to the specific issue at hand. This strategic approach ensures that legal guidance is not only comprehensive but also tailored to the intricacies of the regulatory landscape in various jurisdictions.

The quarterly updates and transparent communication channels established between the Board of Directors and C-level management underscore the commitment to robust corporate governance. These measures contribute to informed decision-making, effective oversight, and the adherence to legal and regulatory standards, further fortifying Medial N.V.'s commitment to excellence in risk management and corporate governance.

## **Policies and Procedures**

In accordance with our commitment to regulatory compliance and transparency, Medial N.V. ensures that all policies and procedures will be provided to the relevant authorities within six months from the issuance of the license. This timeline demonstrates our dedication to promptly submit our comprehensive framework to the Gaming Control Board (GCB) for review and scrutiny.

By adhering to this timeframe, we showcase our responsible approach to governance and our commitment to fulfilling all regulatory obligations in a timely manner. Medial N.V. recognizes the importance of aligning with industry best practices and regulatory standards, and providing the complete set of policies and procedures within the designated timeframe reinforces our commitment to regulatory compliance.

We understand that timely submission of these policies and procedures is crucial for establishing a solid foundation for operational excellence. Therefore, Medial N.V. diligently focuses on finalizing and fine-tuning our framework, ensuring that it meets the requirements of the gaming industry and embeds the highest standards of corporate governance.

By submitting our policies and procedures within six months from the license issuance, Medial N.V. aims to facilitate a rigorous assessment by the relevant authorities, enabling them to evaluate our commitment

to compliance and adherence to industry guidelines. We view this as a crucial step in fostering trust, maintaining transparency, and upholding the regulations set forth by the gaming authorities.

In summary, Medial N.V. guarantees the provision of all policies and procedures to the relevant authorities within six months from the issuance of the license, demonstrating our unwavering dedication to regulatory compliance and our proactive approach to fulfilling all obligations in a timely manner.

|                                             | Year 1             | Year 2           | Year 3           |
|---------------------------------------------|--------------------|------------------|------------------|
|                                             | €                  | €                | €                |
| <b>Fixed Assets Assets</b>                  |                    |                  |                  |
| Tangible Assets                             | 3,000              | 8,000            | 20,000           |
| <b>Current Assets</b>                       |                    |                  |                  |
| Trade Debtors                               | 60,745             | 120,000          | 149,900          |
| Prepayments                                 |                    |                  |                  |
| Bank Accounts                               | 5,000              | 50,000           | 8,000,000        |
| <b>Current Liabilities</b>                  |                    |                  |                  |
| Trade Creditors                             | - 1,696,518        | - 505,651        | - 549,655        |
| Accruals                                    |                    |                  |                  |
| <b>Total Assets and Liabilities</b>         | <b>- 1,627,773</b> | <b>- 327,651</b> | <b>7,620,245</b> |
| <b>Capital &amp; Reserves</b>               |                    |                  |                  |
| Share Capital and Shareholder contributions | 68,745             | 68,745           | 68,745           |
| Retained Earnings/(Losses)                  | - 1,696,518        | - 396,396        | 7,551,500        |
| <b>Total Capital and Reserves</b>           | <b>- 1,627,773</b> | <b>- 327,651</b> | <b>7,620,245</b> |

**Medial N.V.**
**Cash Flow**

|                                      |   | Year 1           | Year 2           | Year 3           |
|--------------------------------------|---|------------------|------------------|------------------|
|                                      |   | €                | €                | €                |
| Net income                           | - | 1,696,518        | 1,300,122        | 7,947,896        |
| Adjustment for change in:            |   |                  |                  |                  |
| Accrued expenses (non-cash)          | - | -                | -                | -                |
| <b>CF from income</b>                | - | <b>1,696,518</b> | <b>1,300,122</b> | <b>7,947,896</b> |
| Working Capital (+/-)                |   | 1,635,773        | - 1,250,122      | 14,104           |
| <b>CF operational</b>                |   | <b>-60,745</b>   | <b>50,000</b>    | <b>7,962,000</b> |
| <b>CF Investment</b>                 | - | <b>3,000</b>     | - <b>5,000</b>   | - <b>12,000</b>  |
| <b>CF Shareholder</b>                |   | <b>64,200</b>    |                  |                  |
| <b>Change of Liquidity</b>           |   | <b>455</b>       | <b>45,000</b>    | <b>7,950,000</b> |
| <b>Issue of Share Capital</b>        |   | <b>4,545</b>     |                  |                  |
| <b>Change of Financing</b>           |   | <b>4,545</b>     |                  |                  |
| <b>Liquidity beginning of period</b> |   | -                | <b>5,000</b>     | <b>50,000</b>    |
| <b>Liquidity end of period</b>       |   | <b>5,000</b>     | <b>50,000</b>    | <b>8,000,000</b> |

**Medial N.V.**
**Profit and Loss Account for the Period Ending**

|  |                                            | Y1                 |          | Y2                |          | Y3                |
|--|--------------------------------------------|--------------------|----------|-------------------|----------|-------------------|
|  |                                            | €                  |          | €                 |          | €                 |
|  | <b>Income</b>                              | <b>4,229,279</b>   |          | <b>29,630,848</b> |          | <b>65,645,386</b> |
|  | GGR                                        | 4,229,279          |          | 29,630,848        |          | 65,645,386        |
|  | <b>Cost</b>                                | <b>- 1,691,712</b> | <b>-</b> | <b>11,852,339</b> | <b>-</b> | <b>26,258,154</b> |
|  | Promotions                                 | -                  |          | -                 |          | -                 |
|  | Affiliates                                 | -                  |          | -                 |          | -                 |
|  | <b>Gross Contribution</b>                  | <b>2,537,568</b>   |          | <b>17,778,509</b> |          | <b>39,387,232</b> |
|  | <b>Operating Expenses</b>                  | <b>- 3,978,255</b> | <b>-</b> | <b>16,093,846</b> | <b>-</b> | <b>30,596,487</b> |
|  | Marketing                                  | - 2,418,000        | -        | 5,836,657         | -        | 9,617,845         |
|  | IT Services                                | -                  |          | -                 |          | -                 |
|  | Development                                | -                  |          | -                 |          | -                 |
|  | Platform Fees                              | - 422,928          | -        | 2,963,085         | -        | 6,564,539         |
|  | Processing Fees                            | - 1,015,027        | -        | 7,111,404         | -        | 14,179,403        |
|  | Supplier Cost                              | - 54,000           | -        | 119,000           | -        | 171,000           |
|  | Annual Licence Fee                         | - 66,700           | -        | 61,700            | -        | 61,700            |
|  | GCB Fees                                   | -                  |          | -                 |          | -                 |
|  |                                            | -                  |          | -                 |          | -                 |
|  |                                            | -                  |          | -                 |          | -                 |
|  | System Audit                               | - 1,600            | -        | 2,000             | -        | 2,000             |
|  | Compliance Audit                           | -                  |          | -                 |          | -                 |
|  | <b>Gross Profit / (Loss)</b>               | <b>- 1,440,687</b> |          | <b>1,684,663</b>  |          | <b>8,790,744</b>  |
|  | <b>Administrative Expenses</b>             | <b>- 255,831</b>   | <b>-</b> | <b>384,541</b>    | <b>-</b> | <b>842,848</b>    |
|  | Accountancy Fees                           | - 1,500            | -        | 2,000             | -        | 2,000             |
|  | Audit Fees                                 | -                  |          | -                 |          | -                 |
|  | Office Expenses                            | - 4,200            | -        | 4,200             | -        | 4,200             |
|  | Professional Fees                          | - 8,000            | -        | 8,000             | -        | 8,000             |
|  | Rent                                       | - 12,000           | -        | 12,000            | -        | 18,000            |
|  | Salaries                                   | - 186,284          | -        | 303,693           | -        | 756,000           |
|  | Telecommunication Expenses                 | - 204              | -        | 204               | -        | 204               |
|  | Travelling & Accomodation                  | -                  |          | -                 |          | -                 |
|  | Other                                      | - 43,643           | -        | 54,444            | -        | 54,444            |
|  | <b>Net Profit / (Loss) Before Taxation</b> | <b>- 1,696,518</b> |          | <b>1,300,122</b>  |          | <b>7,947,896</b>  |
|  | <b>Net Profit / (Loss) After Taxation</b>  | <b>-</b>           |          | <b>-</b>          |          | <b>-</b>          |
|  | <b>Net Profit / (Loss)</b>                 | <b>- 1,696,518</b> |          | <b>1,300,122</b>  |          | <b>7,947,896</b>  |