

Executive Summary

Moonrail Limited BV (“Moonrail”) is a well established Curaçao igaming operator.

Overview of Business Products and Services

Moonrail, established in 2018, is an innovative online gambling platform with its premier brand, CSGOEmpire. Our proprietary gaming software provides a unique, secure, and engaging experience for users interested in esports betting, specifically Counter-Strike. Our already very popular and user-friendly website provides a competitive edge.

Company Management Structure

The management team consists of the following key roles and people:

- Ossi (Founder): driver of the overall creative vision of the company. Sole owner of the company.
- Warren (CEO): spearheads the day to day of the company, ensuring the execution of Ossi’s vision. Joined the company in 2023.
- Milan (CFO): joined the company in 2024 and is in charge of financial reporting, reconciliations, payroll, and all other finance matters.
- Sampsa (CTO): has been with the company since the earliest days and now manages a team of over 20 developers.

Roles to be filled:

- Compliance Officer
- Risk Manager

Reporting Structure:

Our structure ensures clear reporting lines and responsibilities, especially in compliance, with a dedicated path of escalation and accountability.

Business Forecasts

As an already profitable and stable business, Moonrail plans to continue its growth by both entering new markets as well as increasing its presence in its core markets across Latin America and Asia.

Business Growth Strategy

To grow Moonrail's market share, the company will engage more with affiliates, with a focus on social media influencers such as live streamers. Moonrail will also engage in sponsorship deals within esports, including teams and events.

Additionally, the company will also consider strategic acquisitions and investments.

By leveraging our strong technology and rapid development process, the product will continue to be enhanced through new features, games, and engagement such as increased personalization and gamification.

The company is furthermore going to focus on offering relevant payment methods to make sure customers feel at home and welcome to transact with the business.

Sustainability Plans

Our sustainability includes responsible gambling measures, following all industry standard practices and regulatory guidelines on player protection, customer due diligence, and prevention of fraud and money laundering.

Key Suppliers

- **Betting odds provider:** Betby (replacing current providers by Q3 2024)

- **Payment processing:** Zen
- **Banking:** Zen, iSX
- **Risk management:** Seon (anti-fraud)
- **Compliance:** ShuftiPro (customer due diligence/verification)
- **Web hosting:** Amazon Web Services
- **CDN:** Cloudflare
- **Email hosting:** Google

Risk Management

The role of the Risk Manager is to oversee the Risk Management Framework of the company, develop and implement strategies to prevent risks, and incident response management.

Operational Risks

- **System Failures:** Risk of downtime due to server issues or software malfunctions that could disrupt the gaming experience.
- **Security Breaches:** Risk of cyber-attacks leading to theft or compromise of user data and financial information.
- **Payment Processing Failures:** Risk of failed transactions due to payment gateway issues, affecting cash flow and user trust.
- **Regulatory Compliance Failures:** Risk of non-compliance with online gambling laws and regulations, potentially leading to fines or loss of license.

Market Risks

- **Changes in Regulation:** Risk of new laws or changes in existing laws that could restrict operations or increase operating costs.
- **Competition:** Risk of losing market share to new or existing competitors with better offerings or marketing strategies.
- **Reputation Damage:** Risk of negative publicity affecting user acquisition and retention.

Financial Risks

- **Foreign Exchange Risk:** Risk of loss due to fluctuating exchange rates if operating in multiple currencies, including virtual currencies.
- **Liquidity Risk:** Risk of not having sufficient cash flow to cover operational needs or unexpected expenses.
- **Fraud Risk:** Risk of internal or external fraud leading to financial loss.

Strategic Risks:

- **Technology Advancements:** Risk of the technology becoming outdated, necessitating significant investment in upgrades.
- **Market Demand Fluctuations:** Risk of a decrease in user interest in CSGO or esports betting.

Legal and Compliance Risks:

- **Intellectual Property Infringement:** Risk of inadvertently infringing on third-party IP rights or having Moonrail's IP rights infringed upon.
- **Data Protection Compliance:** Risk of failing to meet international data protection standards like GDPR, leading to penalties and loss of user trust.

Environmental and Social Risks

- **Responsible Gambling Issues:** Risk of users developing gambling addictions, leading to regulatory scrutiny and reputation damage.
- **Sustainability Concerns:** Risk of failing to meet environmental sustainability goals or social responsibility expectations.

Legal and Governance Framework

The board of directors consist of Christopher van Rosberg and Lorenza Godett, who act in line with the Founder's vision. Day-to-day management is undertaken by the CEO, who reports to the board of directors.

Lorenza Godett also acts as the company's MLRO.

Decision-Making Process

Moonrail finds that operating an open environment where anyone is free to voice their opinions is the best way to run a competitive business. However, ideas that lead to change go through the CEO, who will confer with the board of directors if the change is likely to affect the company's regulatory obligations, have significant financial impact, or carry any similar such risks or concerns.

Once approval has been issued by the CEO, the task is handed over to the relevant department head for development and implementation.

KPIs

Key Performance Indicators are:

- Amounts Bet
- Skins Traded
- Monthly Active Users
- User Acquisition Cost (UAC)
- Customer Lifetime Value (CLV)
- Retention Rate

Policies and Procedures

- AML Policy
- Responsible Gaming Policy
- Information Security Policy and Incident Management Procedures