

Business & Financial Plan

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Business Plan

I- Scope

Our Mission

HNA Gaming B.V. is a newly incorporated company seeking a remote gambling license in Curacao. The purpose of this business plan is to apply for its license and for the company to document its intended business activities.

HNA Gaming B.V. is dedicated to providing a secure, entertaining, and responsible online gaming experience for players.

Our Key Points

- **Regulatory Excellence:** We will commit to ensuring the highest standards of regulatory compliance to provide a safe, efficient, and fair gaming environment. We will also guarantee the development and implementation of regulatory frameworks, guidelines, procedures, and policies that are effective, transparent, and in line with the needs of stakeholders.
- **Diverse Gaming Offer:** We aim to offer a wide range of online gaming services, including casino games, sports betting, poker, and live casino games.
- **Experienced Management:** Our Management team brings years of collective experience in the iGaming industry.

II- Company Description

Company Background

HNA Gaming B.V. is a newly incorporated company, founded in 2023, seeking a remote gambling license in Curacao. The company is registered as a Limited Liability Company (LLC) under Curacao's legal framework, ensuring legal compliance and accountability. Our headquarters are located in Schottegatweg Oost 10 Unit 1- 9, Bon Bini Business Center, Curaçao.

Company Structure

UBO / CEO

The UBO and/or CEO holds a multifaceted and strategic role in the company. Responsible for steering the company toward success, the UBO and/or CEO combines vision, leadership, and adaptability to navigate the complexities unique to online gaming.

Key Responsibilities:

- Vision and Strategy: The UBO and/or CEO sets the vision and strategy for the company. This involves anticipating market trends, understanding player behavior, and formulating plans to stay ahead in a competitive landscape.
- Leadership and Team Management: Effective leadership to foster a cohesive and motivated team. The UBO and/or CEO will inspire innovation, creativity, and excellence among employees, recognizing that the collective talent and expertise of the team are critical assets.
- Regulatory Compliance: Navigating the global and local regulations will be a central aspect of the UBO and/or CEO's responsibility. Staying informed about legal frameworks, licensing requirements, and compliance standards is crucial to ensuring the company operates ethically and within legal boundaries.
- Technological Innovation: Embracing and driving technological advancements is vital in the iGaming sector, the UBO and/or CEO will focus on innovation within the company, keeping up-to-date of emerging technologies such as blockchain, artificial intelligence, and virtual reality to enhance the gaming experience and maintain a competitive edge.
- Risk Management: The industry is characteristically dynamic, the UBO and/or CEO will implement robust risk management strategies to safeguard the company's assets and ensure operational resilience.
- Stakeholder Relations: Building and maintaining positive relationships with stakeholders, including investors, regulators, and business partners, will be a key aspect of the UBO and/or CEO's role.

Compliance Officer

The Compliance Officer shall be fully conversant with local Gaming & AML legislation. As well as the regulatory framework in Curacao. The official undertaking of the compliance function shall be appointed and approved pre-licensing. The compliance officer shall be a senior officer of the company, with direct reporting lines to the UBO.

Compliance Officer responsibilities include:

- To represent the licensee and act as the primary point of contact with regulatory Authorities.
- To directly oversee the licensee's operations and compliance with the law on a day-to-day basis.
- To be fully aware of its operations and to be able to answer questions about it in the event of requests from Authorities.
- To ensure the gambling systems work, and that he or she has full access to them.
- To ensure the licensee's tax is paid on time and in full.
- To submit the following in a timely manner, and regulatory reporting requirements:
- To assist in the certification, investigation, and enforcement process.
- Ensure the company follows financial laws, particularly regarding money laundering.

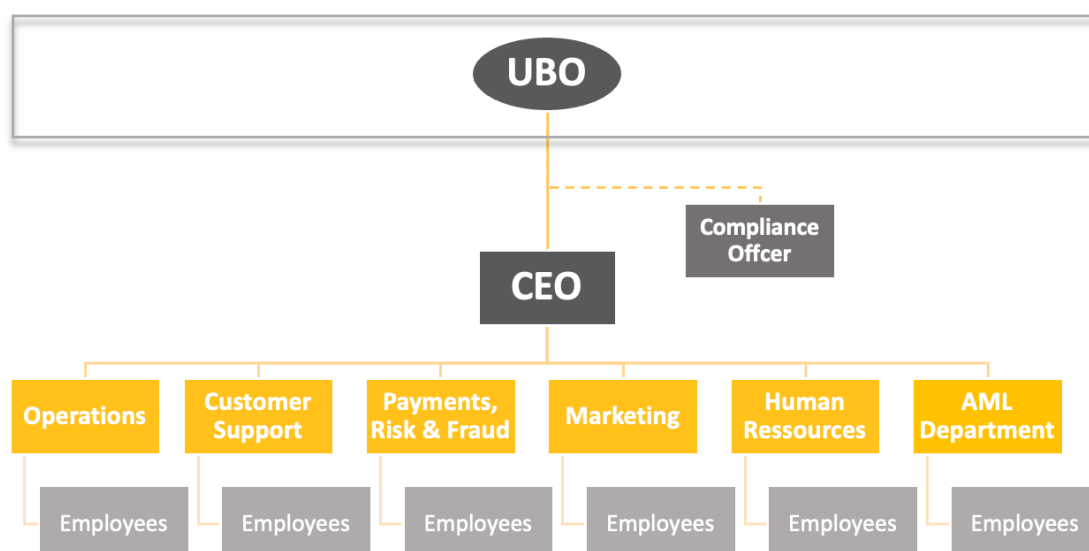
AML Department

The AML Department shall be a team of reliable and positive individuals with a passion for operations, specializing in risk and fraud, AML and RG procedures. They will also have experience in most instances related to the field, such as Chargebacks, lost transactions, KYC's, but with a real passion within the

AML and RG fields. The AML Officer in charge shall be a senior officer of the company, with direct reporting lines to the UBP/CEO.

The responsibilities include, but are not limited to:

- Prepare and maintain sound AML procedures.
- Conduct risk assessments.
- Conduct Enhanced due diligence.
- File Suspicious Activity Reports (SARs) and/or Suspicious Transaction Reports (STRs)
- Ensuring that the staff is properly trained to detect money laundering.
- Carry out activities to detect placement (physically placing bulk cash proceeds), layering (separating the proceeds of criminal activity from their origins through layers of complex financial transactions), and integration (providing an apparently legitimate explanation for the illicit proceeds).
- Following and implementing company policies in relation to anti-money laundering
- Reporting to the Board and following up on matters with the FIAU.



Overview of the Industry and Positioning

The online gaming industry in Curacao is thriving with players seeking diverse, safe, and engaging gaming experiences. The market is characterized by a growing interest in online gaming across all demographics.

It is HNA Gaming B.V. intention to offer online virtual casinos and online live casinos to their registered players. It is also envisaged that the company will in the future have a sports betting offering.

Comparing to the current operators in market our solution will be very similar to the competition but at the same time unique due to our way to work and emphasise Responsible Gaming and promote the best RTP to players as well as the speed of payouts and overall services. We believe this is a big market and it keeps growing rapidly so we have a change to grow with it and, in the future, be a relevant operator and play a role in the market.

Target Markets

The targeted customers will be from 18 to 40 years old as they are easier to reach through social media and advertisement, and we have a good profile of what we believe is a good player. This is a generation swap where most of the individuals have made a purchase online and trust online purchases and they are used to using the internet. Most have also already tried to play games online or casinos online. This is the future of the industry. The targeted group will have a medium-income type from 1,500€ - 3,000€ monthly and will be standard balances individuals who have a stable working and personal life.

Market Trends

- **Mobile-friendly:** A significant shift towards mobile gaming is evident, we want to ensure that our sites will be mobile-friendly using the best technology available from gaming platforms.
- **Live Casino Games:** There is a rising demand for live casino or live deal games that provide an immersive casino experience.
- **Regulatory focus:** Regulatory authorities are imposing stricter requirements, emphasizing the importance of compliance and responsible gaming, to ensure the security of players.

Competitors

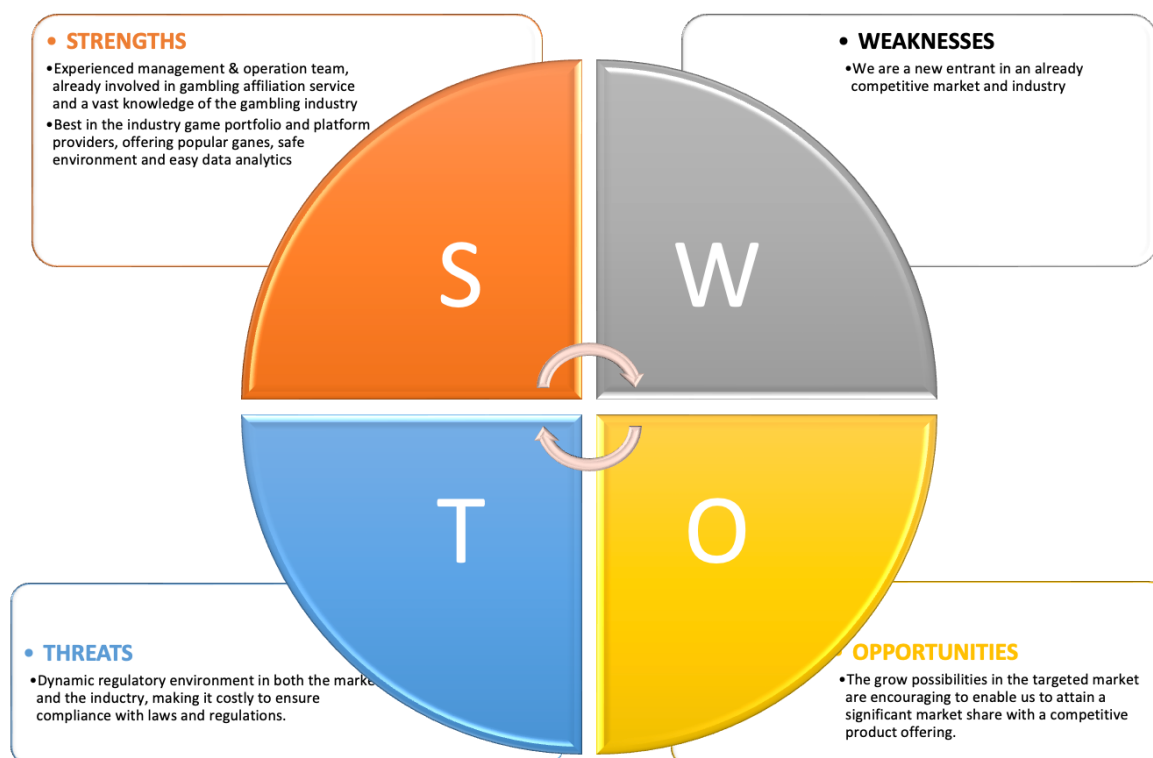
Direct competitors would be the new brands that are going live in 2025 and the last quarter of 2024. As the industry moves fast, it is difficult to identify a direct competitor, but the market of online gaming is wide and a healthy and encouraging growth, meaning that there is an increase in potential customers which gives us a good chance to build a base and keep our brand growing.

We believe that our solution should be equal to or better than what the offer currently is today, and this is based on our expertise to offer players the services they like with quick transactions – deposits and withdrawals of winnings – and an attractive Welcome Offer.

SWOT Analysis

Our company's strengths would be that we are backed by an amazing team that have worked in gaming and have managed to contribute to many companies' growth. We have a deep understanding and valuable experience of the industry. As a concrete example, we can negotiate the best deals with our network of affiliates and get the most profitable deal per player which contribute to have a great profit, which will be re-invested in the company to ensure a continuous growth.

Our weakness is the fact that we are now entering as a newcomer in the market, which is already competitive, and despite our experience, we will need to make a name for ourselves.



Threats are any sudden regulatory changes that may impact our operation within the first months of being live before we can ensure a stable and solid growth base.

Our main intent is to push for quick growth and be able to re-invest profit in the company to ensure good stability and be able to overcome any change coming our way.

III- Marketing Plan

Online Advertising

We intend to promote our casinos through PPC campaigns and social media promotions depending on the regulation and country's legislation.

Affiliate Marketing

We will use our wide affiliate network using rev share and CPA deals by partnering with gaming affiliates to promote our brand(s).

Customer Acquisition

We will employ targeted marketing campaigns and loyalty programs to attract and retain players, fostering a growing player community.

Customer Support

A dedicated and experienced Customer Support team will be available 24/7 in multiple languages to assist the players with the inquiries, complaints, and issues. We want to ensure a swift and effective problem resolution.

IV- Legal

Regulatory Compliance

- **Understanding regulations:** HNA Gaming B.V. has a comprehensive understanding of the iGaming regulations in Curacao, as outlined in the Curacao Gaming Control Board's guidelines. We are dedicated to strict compliance and transparency in our operations.
- **Licensing Process:** We have initiated the application process for the Curacao iGaming license. This license is essential for legal and legitimate operation within the jurisdiction.
- **Compliance measures:** Our compliance framework includes regular audits to ensure fairness and transparency, solid player verification procedures to prevent underage gaming and a dedicated experienced compliance team responsible for ongoing adherence to regulations.

Terms & Conditions

Legal will be described on the site as Terms & Conditions accessible from any page of the website. Additionally, the player will be asked to read and agree to those Terms when registering an account on the website(s). The Terms & Conditions will outline the agreement between the customer and HNA Gaming B.V.. Failing to accept the mentioned terms will result in the cancellation of the registration of the user's account with immediate effect.

Risk Evaluation

Within the framework of our unwavering commitment to the highest standards of integrity, security, and transparency, (- -) has instituted a comprehensive Anti-Money Laundering (AML) policy. This policy is meticulously designed to fortify our operational framework against the infiltration of illicit financial activities and to ensure unwavering compliance with global regulatory mandates.

Principal Aims of Our AML Policy:

- **Prevention of Money Laundering:** (- -) maintains an unequivocal commitment to thwarting any attempts at utilizing our platform for money laundering. Rigorous procedures are in place to detect and deter transactions displaying indicators of potential money laundering activities.
- **Adherence to Regulatory Norms:** We pledge strict adherence to all pertinent laws and regulations governing AML and Counter-Terrorist Financing (CTF). Our policies undergo regular scrutiny and refinement to stay in consonance with the dynamic regulatory milieu, thereby guaranteeing full compliance.
- **Customer Due Diligence (CDD):** (- -) conducts exhaustive Customer Due Diligence, delving into understanding our users, their financial transactions, and the intrinsic nature of these dealings. This encompasses the verification of customer identities, ongoing account activity monitoring, and comprehensive risk assessments.

- **Continuous Surveillance and Reporting:** Our systems are fortified with robust monitoring mechanisms to perpetually assess transactional patterns and discern any aberrant or suspicious behaviour. In instances of detecting such activities, we undertake expeditious reporting to the pertinent authorities.
- **Employee Training and Awareness:** (-) invests significantly in exhaustive training initiatives, ensuring that our personnel are well-versed in the intricacies of money laundering risks. Employees play a pivotal role in recognizing and promptly reporting any activities that raise suspicion.

This introductory elucidation serves as a testament to our steadfast commitment to upholding the most elevated standards of security and compliance. It lays the groundwork for the ensuing exhaustive AML policy, delineating intricate procedures, protocols, and mechanisms instituted to fortify our platform. We invite all concerned parties to acquaint themselves with our AML policy, thereby gaining profound insights into our dedication to a secure, trustworthy, and legally sound operational environment.

NB: *The full AML Policy can be found as addendum.*

V- Overview of the products

Services offered

HNA Gaming B.V. website(s) will provide a comprehensive offer of online gaming services, including:

- **Casino Games:** A broad selection of classic and modern casino games
- **Poker:** Online poker rooms for players of all skill levels
- **Live Casino Games:** Real-time, interactive casino games with live dealers
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Revenue Model

- **Player Bets:** Revenues generated through player's bets on various games
- **House Edge:** Profits from the inherent advantage of casino games

VI- Financial Projections

Players

Player Activity

Cost of Sales

Profit & Loss

Balance Sheet

Cash Flow Statement

Safeguarding Player's Funds