

Zoomba B.V.

Business Plan Version: 1.0

1) Overview of the business products and services/brands as well as proprietary IP.

Zoomba B.V. was incorporated in 2023.

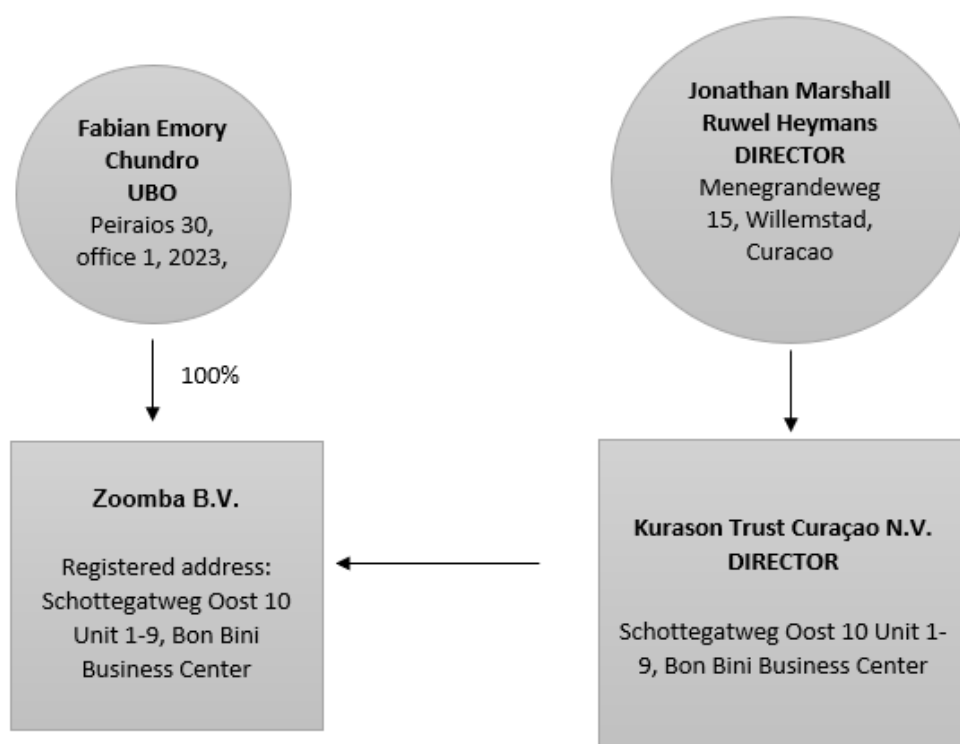
The company will offer B2C services to dotcom markets, primarily Brazil. The services will include sportsbook, slots and live casino.

The company will start with one brand called Zoombaplay.com and hopes to expand in the future to multiple brands. The competitive edge will be due to the UBOs unique experience and knowledge of the gaming industry, which will allow him to use his vast network to gain access to products/services at favourable rates, which will allow him to offer a competitive B2C service.

2) Company management structure showing key management roles and reporting lines.

Mr. Chundro will be the only shareholder, with a 100% stake in this business. Given the nature of the industry and stage of the business (start-up), tasks will be initially outsourced to the reputable parties i.e. the platform provider will be Betconstruct, a well-known software company. Betconstruct will handle all key functions until the business reaches a certain level. The company plans to bring operations in-house only after attaining sufficient scale. By using Betconstruct's platform and support services, Mr. Chundro will be able to initially manage the business alone while the business gets off the ground, effectively minimising costs.

The company currently does not have a Compliance Officer and will rely on their local CSP and external consultants for compliance matters. However, the plan is to hire a Compliance Officer as soon as sufficient scale has been achieved.



3) Business forecasts

Funding for the business will directly from the UBO, who has sufficient income and savings to cover the necessary investments required.

Initially, the investment requirement will be very low due to Mr Chundro's network of CSPs and providers. A brief breakdown:

Curacao Company set up – 8,000 EUR

CEG Sublicense – 12,500 EUR

Bet Construct Platform – 4,000 EUR

Total initial investment required: 24,500 EUR

The business launch will be low cost as the company received a special deal from Betconstruct, whereby all services will be provided for approx. 4,000 EUR, which includes the platform, sportsbook, live casino, slot games and all the necessary integrations.

The company has not yet finalised detailed financial projections as it is still in the start up stage, and the goal for 2024 is to get the technical and payment infrastructure set up before considering a launch in January 2025.

Over the next few months, the business will prepare detailed financial projections, as this will form the basis of the marketing spend and user acquisition. Given that this is the first B2C gaming offering for the UBO, the project will start slow to ensure the process is managed well. The first year of operations will be dedicated to establishing the company in the market, and will not have high levels of marketing-spend (less than 10k EUR per month), which aligns with our strategic initiatives, including targeted market expansion, continuous improvement of user experience, and the introduction of innovative features. With a solid foundation and proactive business strategies.

Given the time-restraints with the GCB deadline, the company has not included the draft financial projections in this application as we wanted to avoid providing draft and/or unreliable forecasts, so we have decided to provide only top-level plans and will provide more detailed forecasts when ready.

4) Overview of intended strategy for the business growth and to secure/maintain/grow market share with specific financial and marketing plans.

The initial strategy of Zoomba B.V. is not to follow an aggressive growth model, but instead ensure organic growth and market share acquisition, applying financial prudence with targeted marketing initiatives. This is possible by leveraging the UBO's network, for example the initial investment will cover essential setup costs, including Curacao Company incorporation, CEG Sublicense acquisition, and Bet Construct Platform integration, totaling 24,500 EUR.

Initially, marketing spend will be conservative, aligning with strategic goals of targeted market expansion, user experience enhancement, and innovation introduction. Monthly marketing expenditure will be capped at less than 10,000 EUR, allowing for prudent resource allocation and careful management of the business's entry into the competitive landscape. This cautious approach will ensure sustainable growth while maintaining financial stability.

Over the coming months, Zoomba B.V. will refine its financial projections, guiding marketing spend and user acquisition strategies. With a solid foundation, proactive business initiatives, and prudent financial management, Zoomba B.V. aims to secure and expand its market share, establishing itself as a prominent player in the B2C igaming sector by 2025.

5) Who are the key suppliers and material dependencies?

The main supplier and key dependency is Betconstruct, who is a globally well known software company and licensed in many jurisdictions. Our business will benefit from their comprehensive back-office solution, tapping into their expertise in operations. All the technical aspects will be delivered by Betconstruct, including the sportsbook and gaming content. Our focus is on marketing the website, delivering customer support, and overseeing third-party payment systems. Payment providers will be arranged after we have obtained the license e.g. Pix.

Given that Betconstruct is the main supplier, it poses the largest risk to the operations. Given their role and importance, the company will not be able to manage this risk independently and has to rely on their reputation and the fact that they are licensed and tested by reputable companies and jurisdictions. Based on this, we feel the risk is lower than if the company had to rely on its own systems, given that the company does not have the same resources available to Betconstruct.

6) Risk evaluation and management.

All technical aspects are outsourced to Betconstruct, meaning that the level of risk remaining for the company would be based on actual operations e.g. quality of customer service, retaining players, marketing strategies etc. The company will assess this risk on a quarterly basis by way of reviewing reports run off the platform to see the different KPIs. Over time, this review process will become more sophisticated as the company gains more experience in specific areas.

At the beginning, risk analysis will be done by Mr Chundro. However, with growth, this will be outsourced to experts and/or internal staff (that will be recruited when a certain scale is achieved).

7) Legal and governance framework.

The board is composed of Mr. Chundro (UBO) and Mr. Jonathan Heymans (Managing director of the curacao company). While Mr. Chundro typically takes the lead in decision-making, corporate matters are discussed among the board members. Presently, legal support, when needed, is sought from local law firms. As the company grows and its resources expand, there may be considerations for expanding the board membership.

8) Target KPIs and business objectives

The businesses main measure of success would be whether it is able to operate independently using its own cash flow. The UBO does not expect to extract profits from this venture for the first year, so there is less pressure on the business. The business has not yet

developed key KPIs but will do so during the next 6 months, after launch. This is so that the company is not burdened by KPIs that it cannot test e.g. some KPIs in theory work well but in reality it may not provide the necessary insight. Initially, the KPIs would be 1. number of new registrations 2. number of deposits 3. average value of deposits 4. GGR.

9) Policies and Procedures

The policies and procedures of the company were obtained from templates available from CEG. The company will modify these templates to ensure they are in line with the requirements of the GCB and are happy to share copies when required.