

Business Plan 2024

21.03.2024

Wainsworth Ludomatics N.V.

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Executive Summary

We are a company of experts in gambling and marketing and promotional activities.

The core business of Wainsworth Ludomatics N.V. consist of:

Offering online gambling formulating its expertise in providing games of chance and wagering through the internet.

The company aims to develop and scale an exclusive and VIP focused online casino brand: Ibiza Palace (ibizapalace.com) under the license to be obtained from the Curacao Gaming Control Board.

The company has plans to operate activities in select European markets aligned to local regulations, with further expansion into Asia, Africa and Latam.

Operational hub is located in Lisbon, Portugal.

The head office is located in Limassol, Cyprus.

Business Strategy

Our vision is to become a respectable and recognised operator in the gambling industry by delivering innovative solutions and exceptional service to our customers. We want to offer a safe, engaging and quality reference offer in the markets in which we position ourselves.

The company`s mission is to provide:

- An exclusive and multi-branded network of casino projects, and to establish itself as a leader of superior experiences in the entertainment business.
- creative, fast and exceptional gambling services leveraging our online casino and marketing expertise within the entertainment industry in general and licensed gambling businesses in particular.
- innovative and premium online entertainment services through proprietary developed technology together with a select set of trusted third party systems.
- We build the company by leveraging our group's wider market reach, reinvesting generated revenue and scaling the levels of its success in the market.

- Wainsworth Ludomatic N.V. as an exclusive boutique company to acquire and serve high value players and provide the most rewarding experience whilst furnishing a safe environment for customers to play.

The Company's strategic goal is to become a recognised and reputable entertainment company at a global level. We will achieve this by continuously developing our infrastructure to scale through the group's wider strategic acquisitions.

Company Structure

Management Structure

UBO: Alberts Kononovs

Director: Gouloud Hammoud representing Guardian Corporation Curacao B.V

Compliance Officer: Eleni Karaiskou

Product Offering

Wainsworth Ludomatic N.V. prides itself in offering premium services in a safe environment. As such, we select partners that meet the highest standards and therefore support our vision of exceptional service, fairness and highest quality offer to all our customers.

Our key partners in game provision and payment provision are as follows:

Game Providers

• 1x2 Gaming • 3oaks • Amatic • Amigo • Amusnet • Aviatrix • Barbara Bang • Belatra • Betsoft • BGaming • Big Time Gaming • Booming • Caleta • Darwin • ELK Studios • Endorphina • Fugaso • G Games • Galaxsys • Gameart • Gaming Corps • Gamzix • Hacksaw • Jade Rabbits	• Kalamba • Leap Gaming • Netgaming • Nolimit City • Pariplay • Pateplay • Platipus • Play'n Go • Pragmatic Play • Push Gaming • Quickspin • Red Rake • RedGenn • Reevo • Relax (+ Silver Bullet) • Revolver • Skywind • SlotFactory • Smartsoft • Tada • Thunderkick • Tom Horn • Wazdan • Yggdrasil
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Payment Options

Payment Card Processing:

- Payabl
- Paysend
- eMerchantPay

Alternative Payment Methods:

- Neosurf
- eZeeWallet
- Skrill
- Neteller
- PaysafeCard
- ecoPayz
- MuchBetter
- CASHlib
- Flexepin

Instant transfers:

- Interac

Banking providers:

- Genome
- Payment Execution
- Paysend

Operations

Wainsworth Ludomatic N.V. operates under a number of different policies and procedures, each created to support a safe and trusted environment for our customers. As such, dedicated staff are provided the responsibility on a continuous basis, to maintain and optimise our policies alongside identifying where improvements can be made. When created or updated, each policy is versioned and subsequent changes described in a changelog. Every company policy is made available through a shared portal and staff provided regular training to ensure an as effective execution and adherence as possible.

Responsible Gaming

The Company is committed to player protection and the prevention of excessive gambling. We strive to provide a high level of player protection, promote responsible gambling and inform our players on the options available for them to maintain their gambling as a form of entertainment within their control.

Our approach to the higher value player segments comes with a strong commitment towards nurturing sustainable customer relationships through and maintaining a safe environment for our players and staff. Players are conveniently able to set personal budgets, take a cool-off period or exclude themselves, either for a longer period or indefinitely.

All staff undergo responsible gambling awareness training, to ensure the obligations pertaining to this area are understood throughout the business. The operational teams, that either interact directly with players or review account activity, undergo additional training. These teams are made aware of their responsible gambling responsibilities, as they are often the first to notice at-risk behaviors in players activity and need the resources in order to address this immediately.

Business Continuity and Disaster Recovery

Wainsworth Ludomatic N.V. operates under a detailed policy plan and set of procedures in the case of a crisis and/or disaster, with a clear goal of effective recovery and business continuation. As such, personnel are provided with a clear understanding of who should be contacted and how to best approach a secure and effective activation of our disaster recovery plan (DR).

The DR plan relies principally on key members of management and staff, who possess the technical and management skills necessary to achieve an effective business and technology recovery. Where relevant, key suppliers are engaged in efforts to support the recovery of the business operations in order to return the company into normal operating mode as soon as possible.

An Emergency Response Team (ERT) is established with designated staff allocated, responsible for activating the DRP during disasters identified within the plan, as well as in the event of any other occurrence that affects the company's capability to perform normally.

Dedicated media staff is responsible for the coordination with media, working according to guidelines that have been previously approved and issued for dealing with post-disaster communications.

AML

The Company will monitor account activity with special attention, and to the extent possible, the background and purpose of any more complex or large transactions and any transactions which are particularly likely, by their nature, to be related to money laundering or the funding of terrorism.

All staff are trained in AML processes and procedures by the compliance team and will actively participate in preventing the services of the company from being exploited by criminals and terrorists for money laundering or terrorist financing purposes.

- The objectives of this and related policies are:
- ensuring the Company's compliance with all applicable laws, statutory instruments of regulation, and requirements of the Company's supervisory body;
- protecting the Company and its staff as individuals from the risks associated with breaches of the law, regulations and supervisory requirements;
- preserving the good name of the Company against the risk of reputational damage presented by implication in money laundering and terrorist financing activities;
- making a positive contribution to the fight against crime and terrorism;
- providing the services in strict accordance with AML and KYC policies developed by the compliance team, Fraud and payments and Finance
- Screening and reporting on suspicious and unusual transactions; collecting the needed data of the cardholders (based on GDPR regulations).

Verification Of Players

The company will conduct the KYC ("Know Your Customer") procedure. Each player will need to provide full personal information upon registration, including:

- First name, Last name,
- Date of birth,
- Residential address,
- Country of residence,
- Contact details (email, phone number).

Anonymous accounts and multiple registrations by the same user are strictly prohibited.

Before performing any payout of winnings, the company will require a player to verify their accounts. Each user will need to submit the following:

- Valid photo ID document,
- Proof of address (not older than 3 months),
- Proof of bank details, confirming the ownership of bank account by the player.
- Following a risk-based approach, the company will also verify payment cards and proof of source of funds whenever deemed necessary.

Player accounts will be fully verified once documentation is checked and approved.

Legal and governance framework

Responsibilities of the board:

- The company is led by a sole statutory director who plays a pivotal role in offering support, ensuring that the company is in compliance with all operational aspects.
- The Chief Compliance Officer ensures the company's adherence to regulatory requirements and comprehensive compliance with all relevant compliance and regulations.
- The Compliance Officer and the Director work collaboratively to establish and enforce all necessary policies and procedures, ensuring the company operates in strict accordance with the regulatory framework of Curacao.
- The Compliance Officer stays abreast of upcoming regulations, collaborating closely with the Director to hold regular meetings. This ensures that the company remains current and responsive to evolving regulatory requirements in curacao.

Policies and Procedures

- The company internally develops its policies and procedures with the assistance of the Legal and Compliance departments, ensuring a comprehensive approach that aligns

with legal standards and regulatory requirements.

- The GCB is promptly informed of any updates to ensure alignment with regulatory requirements.
- When drafting policies and procedures, the company ensures that the assigned individuals are qualified for their respective tasks. For instance, the Anti-Money Laundering (AML) department is responsible for drafting the AML and CFT policy, with finalization being a collaborative effort between the Legal and AML departments to ensure thorough and qualified completion.
- The Responsible Gambling Officer initiates the drafting of the Responsible Gambling Policy and Procedures, outlining the Company's core values and emphasizing socially responsible marketing and player protection. Subsequently, the Legal and Compliance departments assume responsibility for finalizing the policy, ensuring it aligns with all relevant guidelines and regulatory requirements.
- The AML and Responsible Gambling Officer are qualified in their sectors in order to draft and implement the policies and procedures of the company.

Risk Management

Wainsworth Ludomatic N.V. implements a Risk-Based Approach (RBA) to combat Money Laundering and Terrorist Financing for online casinos. Through guidance developed by the FATF, Wainsworth Ludomatic N.V. supports the ongoing development of a common understanding of what the RBA involves, outlining high-level principles involved in applying the RBA, and applies good practice for differing risk factors.

Wainsworth Ludomatic N.V. operates a rules-based system including determining whether to apply a risk-based approach, based on specific money laundering / terrorist financing risks, size and nature of the activities of the designated jurisdictions where the company is present, where the customer base is located and where the customers originate from.

The Company also takes into account countries that may have applied anti-money laundering/combating the financing of terrorism (AML/CFT) measures and also whether it is uncertain if designated jurisdictions have sufficient experience to implement and apply an effective risk-based approach.

A cornerstone of Wainsworth Ludomatic N.V.'s approach, focus on specific countries' own risk-base ability to identify and understand the money laundering and terrorist financing risks they are

exposed to, thus ensuring Wainsworth Ludomatic N.V. can prioritize its resources to mitigate risks in the highest risk areas.

The Company continuously strives to AML/CFT measures that correspond to the level of risk in all relevant areas of involvement, in other words: the risk-based approach (RBA).

IT Security

Wainsworth Ludomatic N.V. is dedicated to ensuring the highest level of security and therefore operates under a detailed set of rules and procedures to ensure the preservation of confidentiality, integrity, and availability of all systems and the information used by organization members.

The Security Policy alongside complementary procedures are reviewed by the Company management on an annual basis or whenever significant changes take place. Additionally, a third-party company carries out annual security reviews, providing an official report with any potential nonconformities to be reported by the Company to the authorities.

Before any new updates take place, these are reviewed and approved by the CEO and/or the Board of Directors. All employees (Including contractors) must familiarize themselves with the Security Policy in its entirety and acknowledge it by signing the form confirming they have read and understand this policy fully (Either during the onboarding process for new employees, or when there are significant updates relevant to the employees in the document). As such the Security Policy is versioned for trackability.

- The Information Security Policy provides clear direction for the information security program.
- The Information Security Policy shows that management is committed to information security.
- Management supports the organization's information security policy.
- The Information Security Policy shows that management is prepared to support an on-going commitment to information security.
- The Information Security Policy is consistent with the business objectives.
- The Information Security Policy meets the organization's business requirements.
- The Information Security Policy complies with all relevant laws and regulations Company is subject to.

The CEO (Chief Executive Officer) of Company or the maximum responsible of the IT department is entrusted with direct responsibility for maintaining this policy and providing advice on information security and guidance on its implementation.

The Security Policy broadly consist of:

- Acceptable use policy

- Data classification
- Protect stored data
- Logon and logoff process
- Computer viruses, worms and Trojan horses
- Encryption
- Portable device and media
- Disposal of media & equipment
- Network & Remote Access
- Incident Response Plan
- Security Review Plan
- Security Awareness and Training

The Company, on an ongoing basis, provides Security Awareness training to all employees through the KnowBe4 suite, optimized to secure the “human firewall” through the highest level of education in day to day operations.

Committed to the highest level of security, Wainwright Ludomatic N.V. employs a number of additional security systems to further ensure the protection of players, such as:

Active Protections:

- Our public websites are safeguarded against DDoS attacks and common threats by reputed solutions like Cloudflare and AWS Cloudfront.
- All data is encrypted both when stored and during transmission.
- Access to the casino back-office is restricted to within company premises or through VPN.
- Multi-factor authentication is implemented and enforced wherever possible to enhance security.

Development Cycle:

- Secrets and keys are securely stored to prevent unauthorized access.
- Public APIs utilize robust authentication methods such as OAuth for heightened security.
- Senior engineers conduct thorough reviews of sensitive features.
- We ensure that frameworks used as platform components are regularly updated to address any vulnerabilities.
- Static code analysis (Code scan) is performed with each new version to detect and mitigate potential risks.

Ongoing Improvements:

- Independent third-party audits are conducted annually to identify and address vulnerabilities in both our infrastructure and websites.
- We have established and formalized an internal review process as part of our Incident Response Plan, which is reviewed monthly to ensure its effectiveness in addressing security incidents.

Other:

- Our technology partners, particularly in hosting, are ISO27001 certified, demonstrating their commitment to maintaining high standards of security.

Financial Plan (2024-2026)

Funding

Funding will be through capital raised from personal wealth, operational profits and other professional activities.

Source of Capital

There are no debts. Share capital was injected from shareholder's own funds.

Financial Estimations

The estimated turnover for the 1st/2nd/3rd year are as follows:

2024: EUR 1m
2025: EUR 4.6m
2026: EUR 8.9m

Please see below the income and expenses analysis for the period of 2024-2026

(EUR)	2024	2025	2026
Total Revenue	1,011,607	4,552,232	8,876,853
Game Royalties	-85,987	-386,940	-754,532
Processing Charges	-70,812	-318,656	-621,380
Distribution Costs	-156,799	-705,596	-1,375,912
Gross Profit	854,808	3,846,636	7,500,941
Marketing and Affiliation	-222,554	-1,001,491	-1,952,908
Operational Expenses	-187,147	-819,402	-1,553,449
License Costs	-40,000	-40,000	-40,000
Total Expenses	-449,701	-1,860,893	-3,546,357
EBITDA	405,107	1,985,743	3,954,584

Marketing

Wainsworth Ludomatic N.V. owns a large player database of qualified high value individuals which will be the main source of acquisition activity, further grown through online channels and organic engagement.

Target Markets

French-speaking, Europe, Africa, Asia, and emerging markets.

Excluded Markets

We review our list of excluded markets on a regular basis as well as monitor regulatory changes to ensure we explicitly block people from joining and playing at our Casino where such is clearly prohibited. Please find following the list of countries, listed by the ISO 3166-1 alpha-2 country code, blocked as of the date of the document:

AF, AX, AL, DZ, AS, AD, AO, AI, AG, AR, AM, AW, AT, AZ, BS, BH, BD, BB, BY, BE, BZ, BJ, BM, BT, BO, BA, BW, BV, BR, IO, VG, BN, BG, BF, BI, KH, CM, CV, BQ, KY, CF, TD, CL, CN, CX, CC, CO, KM, CG, CD, CK, CR, CI, HR, CU, CW, CY, CZ, DK, DJ, DM, DO, EC, EG, SV, GQ, ER, EE, SZ, ET, FK, FO, FJ, GA, GM, GE, DE, GH, GI, GR, GL, GD, GU, GT, GG, GN, GW, GY, HT, HM, HN, HK, HU, IE, IN, ID, IR, IQ, IM, IL, IT, JM, JE, JO, KZ, KE, KI, KW, KG, LA, LV, LB, LS, LR, LY, LI, LT, MO, MG, MW, MY, MV, ML, MT, MH, MR, MU, MX, FM, MD, MC, MN, ME, MS, MA, MZ, MM, NA, NR, NP, NL, NI, NE, NG, NU, NF, KP, MK, MP, OM, PK, PW, PS, PA, PG, PY, PE, PH, PN, PL, PT, PR, QA, RO, RU, RW, WS, SM, ST, SA, SN, RS, SC, SL, SG, SX, SK, SI, SB, SO, ZA, GS, KR, SS, ES, LK, SH, KN, LC, VC, SD, SR, SJ, SE, CH, SY, TW, TJ, TZ, TH, TL, TG, TK, TO, TT, TN, TR, TM, TC, TV, UM, VI, UG, UA, AE, GB, US, UY, UZ, VU, VA, VE, VN, EH, YE, ZM, ZW