

LBC Enterprise B.V

Trading as

Lucky Bet

Business Plan

01/03/2023

V3





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Introduction

Lucky Bet is poised to revolutionise the gambling industry by offering a suite of innovative products and services that cater to the diverse needs of gamblers worldwide. Our brand, distinguished by its cutting-edge technology and commitment to customer satisfaction, encompasses a comprehensive range of gambling options including sports betting, casino games, live dealer games, and an array of virtual gambling experiences. At the heart of Lucky Bet's offerings is our proprietary Intellectual Property (IP), which includes unique algorithms for fair play, a secure and intuitive gambling platform, and personalised gambling experiences that leverage the latest in AI technology.

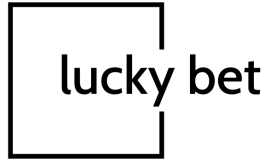
Founded by a serial entrepreneur with a rich history in the gambling, payments and risk sectors, Lucky Bet is part of a group of businesses that share a common vision and are under the common control of our Ultimate Beneficial Owner (UBO), Mr Ian Parke. Our team's collective expertise and shared resources have enabled us to innovate and adapt in the fast-paced gambling industry rapidly. Our background spans decades of combined experience, with each entity within the group contributing to the development of a gambling ecosystem that is both robust and user-focused.

Lucky Bet's competitive edge is derived from our commitment to innovation, security, and customer engagement. Our platform's unique features include an advanced security framework that ensures the safety of user data and transactions, a user-friendly interface that enhances the gambling experience, and a proprietary algorithm that guarantees fairness and transparency in all games. Moreover, our continuous investment in research and development allows us to stay ahead of industry trends and incorporate the latest technological advancements into our offerings.

Adding to Lucky Bet's competitive edge, it's important to highlight our strategic position in the realm of technological advancements within the gambling industry. Lucky Bet proudly holds multiple provisional patent applications for the use of Virtual Reality (VR) and Augmented Reality (AR) in gambling and sports betting. This pioneering use of VR and AR technologies underscores our commitment to providing immersive and interactive gambling experiences that set us apart from competitors.

These applications not only exemplify our innovative spirit but also secure our position as a leader in integrating cutting-edge technologies into the gambling sector. The application of VR and AR technologies in our offerings allows users to enjoy a level of engagement and realism previously unattainable in online gambling. Whether it's experiencing a virtual casino floor that mimics the thrill of being in a physical casino or placing bets in a digitally enhanced version of their favourite sports events, our customers benefit from an enriched, immersive experience that deepens their connection to the games they love.

Our forward-thinking approach to incorporating VR and AR, coupled with our global patents, ensures that Lucky Bet remains at the forefront of technological advancements in the gambling industry. This strategic advantage not only enhances our product offerings but also



solidifies our market position by providing unique and protected gambling experiences that cater to the evolving preferences of modern gamblers. Our continuous investment in VR and AR technologies, along with our broader commitment to innovation, security, and customer engagement, sets the stage for Lucky Bet's sustained growth and success in the competitive gambling market.

Our vision for Lucky Bet is not just to be a leader in the gambling industry but to redefine it by setting new standards for innovation, fairness, and customer satisfaction. As we move forward, our focus will remain on expanding our product range, enhancing our proprietary technology, and delivering unparalleled gambling experiences to our customers. With a solid foundation and a clear path to innovation, Lucky Bet is positioned for success in the competitive landscape of the gambling industry.

Company

Our company will be owned and controlled by a group of experienced professionals with expertise in the iGaming and payments industries. The key individuals in our company include our CEO, CFO, CMO, CTO, and COO. The CEO will be responsible for the overall management and strategic direction of the company. The CFO will manage the company's finances, while the CMO will oversee marketing activities. The CTO will be responsible for the technical aspects of the platform, and the COO will manage day-to-day operations.

Company Management Structure and Hiring Plan

Lucky Bet has established a robust and transparent management structure that ensures operational efficiency, regulatory compliance, and strategic growth. Our organogram reflects a clear separation of roles and logical reporting lines, aligning with the Gaming Control Board's expectations for industry best practices. We have successfully hired for all major C-suite positions, demonstrating our commitment to leadership and expertise at the highest level.

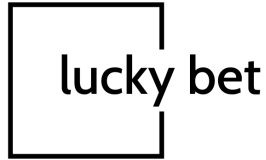
Organogram Overview

Leading our organisation is the Chief Executive Officer (CEO), with strategic oversight of all operations. The executive team, comprising the Chief Financial Officer (CFO), Chief Technology Officer (CTO), Chief Compliance Officer (CCO), and Marketing Director, has been carefully selected to bring unparalleled expertise and leadership to their respective domains.

Chief Financial Officer (CFO): Oversees financial planning, risk management, record-keeping, and financial reporting.

Chief Technology Officer (CTO): Leads the development and operation of online services, IT infrastructure, and technological innovation.

Chief Compliance Officer (CCO): Ensures adherence to legal standards and internal policies, focusing on regulatory compliance and anti-money laundering measures.



Marketing Director: Drives marketing strategies to enhance brand awareness and customer engagement.

Compliance Department

Reporting to the CCO, the Compliance Department is integral to our regulatory strategy, staffed by experts in compliance, legal advisory, and regulatory affairs. This department is critical in ensuring our operations comply with all legal requirements.

We have already begun the hiring process for CCO and have an interim CCO to handle this function at the moment.

Customer Service Manager

Directly under the CEO, the Customer Service Manager is key to our commitment to customer satisfaction, leading our efforts to provide exceptional service.

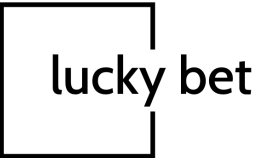
Hiring Plan for Junior Roles

With our executive team in place, our focus shifts to strengthening our operational teams. Over the next 3 to 6 months, we will fill junior roles, focusing on attracting talent that aligns with our core values of integrity, innovation, and customer focus.

Our approach includes;

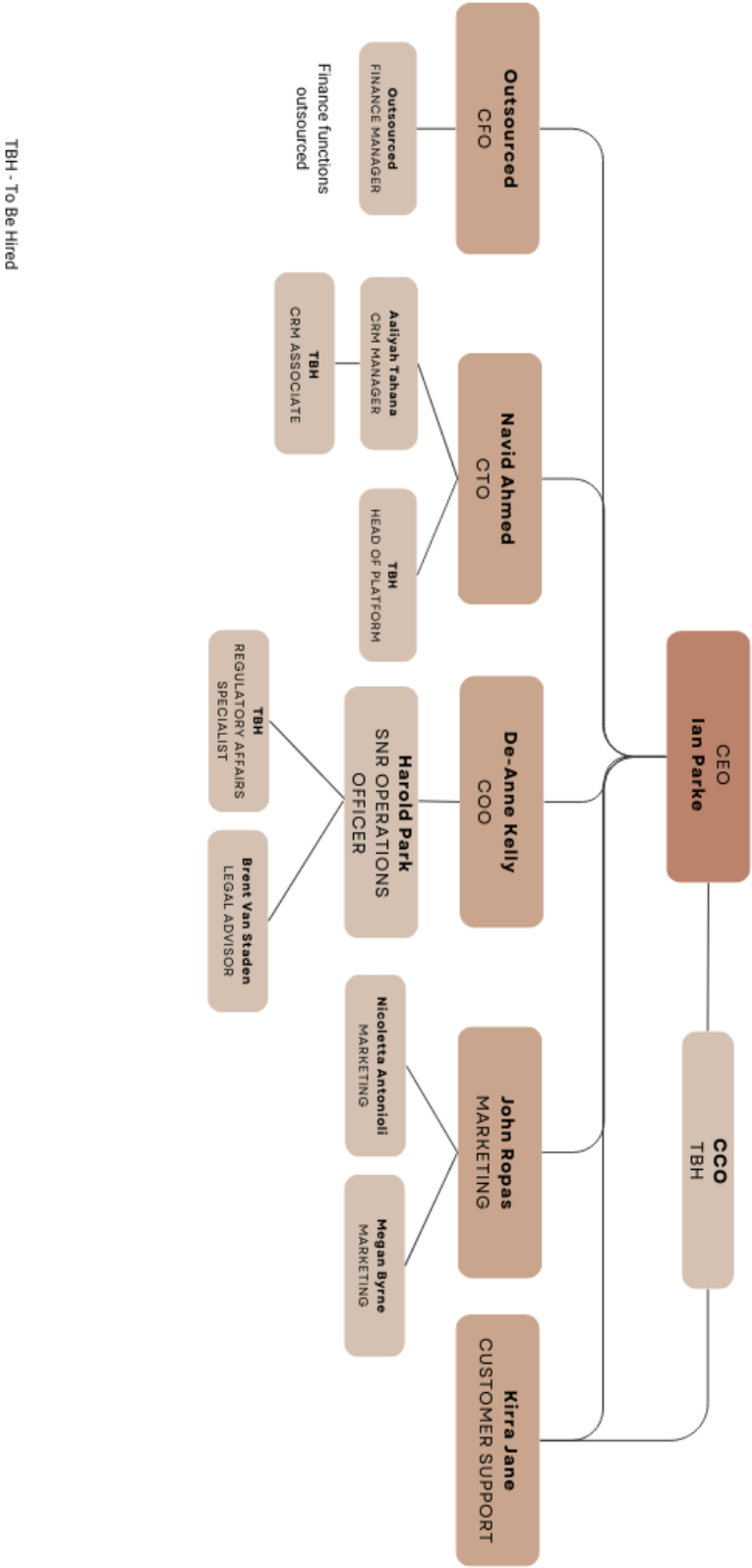
- Targeted recruitment campaigns, leveraging industry-specific job boards and professional networks.
- A comprehensive selection process to identify candidates who not only possess the necessary skills and experience but also fit our company culture.
- A structured onboarding process to ensure new hires are well-integrated into their teams and aligned with our strategic goals.

Our leadership team is now well-established, with all major C-suite roles filled by distinguished professionals. As we proceed to build out our operational teams, we remain committed to upholding the highest standards of compliance, leadership, and operational excellence. This strategic approach to our management structure and hiring plan positions Lucky Bet for sustainable growth and success in the competitive betting industry.



Company Management Structure:

LBC ENTERPRISES MANAGEMENT CHART





Business Forecast

The financial summary for Luckybet over three years, updated with the figures, including revenue, expenses, net profit, growth percentages, and cash flow calculations:

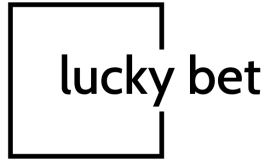
Year	Revenue (\$)	Expenses (\$)	Net Profit (\$)	Revenue Growth %	Net Profit Growth %	Cash Flow (\$)
Year 1	3,611,145.62	1,510,824.77	2,100,320.85	-	-	2,100,320.85
Year 2	14,930,988.49	6,343,198.87	7,366,958.51	313.47	250.75	5,266,637.66
Year 3	81,983,564.87	8,117,999.51	73,861,378.56	449.08	902.60	66,494,420.05

- Revenue Growth % and Net Profit Growth % indicate the percentage increase in revenue and net profit year-over-year, respectively.
- Cash Flow for Year 1 is assumed to be the net profit. For Years 2 and 3, it's calculated as the difference in net profit from the previous year.

Insights on Growth Rate Increase

The substantial growth rates observed can be attributed to the effectiveness of Luckybet's marketing and affiliate marketing strategies. These strategies likely contributed to significant increases in user acquisition, brand visibility, and engagement rates, which are critical factors for revenue growth in the gaming and betting industry.

1. **Marketing Strategy:** Enhanced targeting, personalised campaigns, and optimised ad spending could have improved the acquisition and retention of customers, directly impacting revenue growth.
2. **Affiliate Marketing Strategy:** By leveraging partnerships with affiliates, Luckybet could have expanded its reach into new markets and demographics, driving higher volumes of traffic and increasing player registrations.



3. **Scalability and Network Effects:** As the user base grows, the platform becomes more attractive to both new users and advertisers, creating a virtuous cycle of growth.
4. **Product Diversification:** Expanding the range of betting options and gaming products to cater to a broader audience could also contribute to revenue growth, as it attracts diverse user groups.

These factors combined suggest that Luckybet's strategic focus on marketing and affiliate networks has been a key driver of its exponential growth in revenue and net profit over the three years.

Intended Strategy for Business Growth

Luckybet's strategy hinges on leveraging cutting-edge marketing techniques and affiliate marketing programs to drive user acquisition and retention. The aggressive revenue and net profit growth percentages highlight the effectiveness of these strategies.

Marketing Plan: The plan involves a mix of digital marketing, influencer partnerships, and targeted advertising campaigns aimed at engaging potential users and retaining existing ones. The substantial increase in revenue and net profit year over year is a testament to the planned expansion of these marketing efforts, with a significant portion of the budget allocated to optimising these channels.

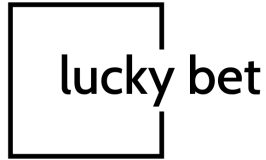
Affiliate Marketing: By strengthening affiliate networks and partnerships, Luckybet aims to tap into new customer segments and geographies, further fueling its revenue growth. The affiliate model, which rewards partners for referring new users, is expected to be a key driver in scaling Luckybet's user base and achieving the projected growth rates.

Market Share: To secure, maintain, and grow its market share, Luckybet plans to continuously innovate its product offerings, ensuring they meet the evolving needs of its users. This includes diversifying betting options and enhancing user experience through technological advancements.

Financial Plans and Funding:

The financial plans are designed to support the strategic growth initiatives, with a clear focus on allocating resources towards high-impact marketing and affiliate programs. The funding strategy includes reinvesting profits and seeking external investments to fuel growth. The projected cash flow figures, particularly the significant jump in Year 3, underscore Luckybet's capacity to generate sufficient funds to support its expansion plans.

As part of our comprehensive financial strategy, Luckybet allocates a budget for corporate governance to ensure compliance, operational integrity, and transparency. The costs associated include



Annual Company Registration: This fee ensures the company remains legally registered and compliant with local regulations. The budgeted cost is estimated to be \$2,000 annually.

Annual Domiciliation: This covers the cost of maintaining a legal address and administrative services. Estimated cost: \$3,000 annually.

Annual CRS/FATCA Compliance: Compliance with the Common Reporting Standard (CRS) and the Foreign Account Tax Compliance Act (FATCA) is crucial for international operations. Estimated cost: \$5,000 annually.

Trust Supervision Fee: This fee is associated with the supervision of trust accounts, ensuring financial integrity. Estimated cost: \$4,000 annually.

Chamber of Commerce Fee: Membership in the Chamber of Commerce helps with networking and compliance. Estimated cost: \$1,000 annually.

Bookkeeping & Financial Statements Fee (Bookkeeper): For maintaining accurate records and preparing financial statements. Estimated cost: \$10,000 annually.

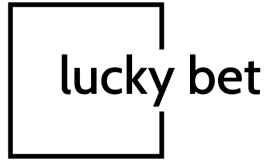
Bookkeeping & Financial Statements Fee (CFA): A Certified Financial Accountant (CFA) provides more in-depth analysis and auditing services. Estimated cost: \$15,000 annually.

Gaming License (Curaçao): A crucial expense for operating legally in the gaming industry. The cost of obtaining and maintaining a gaming licence in Curaçao is \$24,600 annually.

These governance-related expenses total an estimated \$60,000 annually, representing a critical investment in Luckybet's operational integrity and compliance. This allocation is accounted for within the broader financial framework, ensuring that Luckybet not only pursues aggressive growth but also does so while adhering to the highest standards of corporate governance.

Including the corporate governance costs as examples within Luckybet's comprehensive financial model and forecast serves to illustrate the detailed and responsible approach the company is taking towards its financial planning and compliance strategies. These costs, while examples, reflect the depth of planning that goes into ensuring operational integrity and adherence to legal and regulatory standards.

Including these corporate governance costs in Luckybet's financial plans underscores our commitment to legal compliance and ethical business practices. This strategic allocation of resources supports our growth objectives, ensuring sustainability and trust among stakeholders, regulators, and customers. By budgeting for these costs, Luckybet demonstrates a balanced approach to expansion, combining ambitious marketing and affiliate strategies with a solid foundation in corporate responsibility.



Sustainability and Market Growth:

Sustainability plans involve adopting responsible gaming practices, ensuring regulatory compliance, and engaging with the community. Luckybet's growth strategy also includes penetrating underserved markets while avoiding jurisdictions with unfavourable regulatory environments. The financial model budgets for these considerations, ensuring that growth is achieved sustainably and responsibly.

Excluded Markets:

While focusing on expansion, Luckybet plans to strategically exclude markets with high regulatory risks or low profitability potential. This decision is made to optimise marketing spend and ensure that resources are allocated to markets with the highest growth potential.

Luckybet's financial and strategic plans demonstrate a comprehensive approach to achieving sustainable growth, securing a larger market share, and maintaining profitability. The planned marketing and affiliate strategies, supported by a solid financial foundation and responsible market selection, position Luckybet to realise the ambitious growth projected in the financial summary.

Third-Party Service Providers and Risk Management

Our company engages with an array of esteemed third-party service providers to ensure the seamless operation and continuous innovation of our platform. These collaborations span various domains critical to our operations, from secure financial transactions to cutting-edge gaming experiences and robust marketing strategies.

Key Suppliers and Their Roles:

1. **Gaming Innovation Group:** Serving as the backbone of our platform, the Gaming Innovation Group supplies the sophisticated gaming software that powers our extensive portfolio of games. Their expertise not only guarantees a wide array of engaging gaming options for our customers but also ensures continuous updates and technical support to keep the gaming experience seamless and cutting-edge.

<https://www.gig.com/>

2. **Payment IQ:** In the crucial domain of financial transactions, Payment IQ stands as our trusted partner, ensuring that all payments are processed securely and efficiently. Their robust payment processing system offers a reliable and hassle-free financial interface for our users, enhancing their overall experience on the platform.

<https://worldline.com/en/home/main-navigation/solutions/merchants/payment-orchestration.html>



3. **Age-Checked:** Recognizing the importance of responsible gaming, we partner with Age-Checked for KYC (Know Your Customer) and customer verification processes. This collaboration ensures that all users meet the legal age requirements and helps in maintaining a secure and compliant gaming environment.

<https://www.agechecked.com/>

4. **Extremepush:** To cultivate and maintain strong relationships with our customers, we utilise the services of Extremepush. Their customer relationship management platform enables us to engage with our users effectively, offering personalised experiences and timely support, thereby fostering loyalty and satisfaction.

<https://www.xtremepush.com/>

5. **Intelletics:** Managing affiliate relationships is key to our marketing strategy, and Intelletics provides us with a comprehensive platform to oversee these partnerships. Their solutions help in tracking, managing, and optimising affiliate marketing efforts, contributing to our platform's growth and reach.

<https://www.intelitics.com/>

6. **Bankd & Equals:** Our banking partners, Bankd & Equals, provide the financial infrastructure necessary for the smooth operation of our business. From facilitating transactions to managing corporate finances, their services are integral to our platform's stability and trustworthiness.

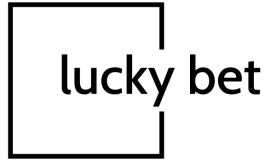
<https://www.bankd.co/>

<https://equalsmoney.com/>

Material Dependencies and Risk Management

The seamless operation of our platform hinges on the reliable performance of these key suppliers. Recognizing the potential risks of service interruption or loss, we have implemented a robust risk management framework that includes:

- **Regular Performance Reviews:** Conducting periodic evaluations of all suppliers to ensure they meet our high standards of service quality, reliability, and security.
- **Diversification of Suppliers:** Where feasible, we maintain relationships with multiple providers for critical services to mitigate the risk of dependency on a single source.
- **Contingency Planning:** Developing and regularly updating contingency plans to ensure business continuity in the event of a critical service interruption or supplier loss.



- **Contractual Safeguards:** Incorporating strict performance clauses and exit strategies in all supplier contracts to protect our interests and maintain service continuity.

Through these measures, we aim to safeguard our platform against disruptions, ensuring a reliable and engaging experience for our users while managing the risks associated with our dependencies on third-party service providers.

Risk Evaluation and Management

Our approach to risk evaluation and management is comprehensive and aimed at ensuring the integrity, security, and profitability of our iGaming and sports betting platform. We employ a multifaceted strategy to assess, mitigate, audit, and oversee risks across all aspects of our business. This includes both internal and external business and financial audits, the establishment of dedicated oversight committees, and the maintenance of detailed risk registers.

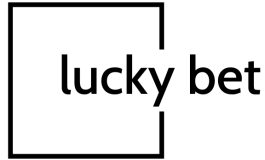
Risk Assessment and Mitigation Strategies

1. Internal Risk Management Processes:

- **Risk Identification:** We continuously monitor our operational environment to identify potential risks, including technological, financial, regulatory, and reputational risks.
- **Risk Analysis:** Each identified risk is analysed to understand its potential impact and likelihood. This analysis helps in prioritising risks based on their severity.
- **Risk Mitigation:** For each high-priority risk, we develop and implement mitigation strategies. These can include diversifying revenue streams, enhancing cybersecurity measures, and implementing robust financial controls.

2. External Business and Financial Audits:

- **Annual Audits:** External auditors conduct annual reviews of our financial statements and operational compliance. These audits provide an unbiased evaluation of our financial health and adherence to regulatory standards.
- **Regulatory Compliance Audits:** Specialised audits focus on our compliance with gaming and betting regulations. These audits help in identifying any deviations from legal standards and implementing corrective actions.



Oversight Committees and Governance

1. Risk Management Committee (RMC):

Composed of senior executives and external advisors, the RMC oversees the implementation of risk management policies. It also reviews risk assessments and mitigation strategies, ensuring they are effective and up-to-date.

2. Audit Committee:

This committee oversees the integrity of financial statements, the effectiveness of the internal control systems, and the independence and performance of external auditors. It acts as a bridge between the management and auditors.

Risk Registers

Maintenance of Risk Registers: We maintain comprehensive risk registers that document all identified risks, their analysis, mitigation strategies, and the status of these strategies. These registers are dynamic documents, regularly updated to reflect new insights and changes in the operational landscape.

Accessibility and Review: Risk registers are accessible to relevant stakeholders, including management teams and oversight committees. Regular reviews are conducted to ensure that the risk management strategies remain effective and relevant.

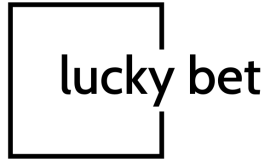
Continuous Improvement

We recognize that the landscape of iGaming and sports betting is ever-evolving, with new risks emerging as the industry and technology evolve. Therefore, we commit to a continuous improvement approach in our risk evaluation and management processes. This includes regular training for our staff on risk awareness and management, updating our technology and processes to counter new threats, and maintaining an open dialogue with regulators and industry partners to stay ahead of regulatory changes and best practices.

Lucky Bet is dedicated to a robust risk management framework that not only protects our operations and stakeholders but also ensures our long-term growth and success in the competitive iGaming and sports betting industry. Through diligent risk assessment, mitigation, audit, and oversight, we aim to uphold the highest standards of integrity, security, and profitability.

Board of Directors Overview

Establishment and Purpose: The LuckyBet Board is foundational to the company's strategic planning and governance, ensuring LuckyBet's trajectory towards long-term success, sustainable growth, and strict adherence to exemplary corporate governance practices.



Composition: Our Board comprises four distinguished non-executive directors, a dedicated company secretary, and an experienced chair. This composition is designed to facilitate comprehensive oversight and informed decision-making at the highest level.

Carolyn Breeze (Chair)
James Tennant (Secretary)
Jim Holmes (NED)
James Walker (NED)
Kara Johnstone (NED)
Michael Pinczuk (NED)
Ian Parke (CEO)

Ownership and Impartiality: Board members collectively hold less than 2% of the company's options. This structure is intentionally designed to prevent any potential conflicts of interest and ensures that decisions are made impartially, effectively eliminating the risk of deadlock within the Board or company.

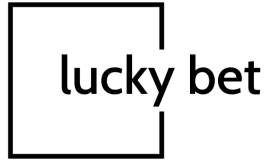
Meeting Frequency and Attendance: The Board convenes monthly, with a minimum of eight meetings per year. These sessions are attended by LuckyBet's CEO, Ian Parke, and, when necessary, subject matter experts or executives from within LuckyBet. This approach allows for a diverse range of insights and expertise to be brought to the table, enriching the decision-making process.

Responsibilities and Oversight: The Board's responsibilities are clearly delineated and include the approval of strategic goals, major initiatives, and financial oversight, while deliberately avoiding involvement in day-to-day operations. It focuses on risk identification and mitigation, ensuring that robust risk management practices are in place. Regular review and approval of financial statements, budgets, and significant financial transactions are key functions of the Board.

Compliance and Ethics: A core aim of the Board is to guarantee compliance with all relevant laws, regulations, and ethical standards, promoting a culture of integrity and transparency. This commitment extends to overseeing legal and operational risk management.

Legal Support and External Advice: The company secretary, alongside external legal counsel, provides necessary legal support and advice, ensuring the company's operations remain within the legal framework.

Board Meetings and External Participation: In addition to the Board members, meetings may include legal advisors or other specialists relevant to the agenda. This policy ensures that the Board's deliberations are informed by comprehensive information and specialised insights, enhancing the quality of decision-making.



The governance structure at LuckyBet, led by our Board of Directors, underscores our dedication to strategic oversight, integrity, and sustainable growth. Our board's design ensures impartial decision-making and effective risk management, separating strategic direction from daily operations. This setup not only aligns with our long-term objectives but also emphasises our commitment to ethical practices and regulatory compliance.

By engaging non-executive directors and minimising ownership stakes, we avoid conflicts of interest and ensure unbiased governance. Regular board meetings, enriched with expert advice, guide our strategic decisions. This governance model reassures stakeholders of our commitment to excellence and ethical business practices, laying a solid foundation for LuckyBet's future success.

Target KPIs and Business Objectives

Defining target Key Performance Indicators (KPIs) and business objectives are crucial for tracking progress, measuring success, and achieving long-term goals. These targets and objectives should leverage the company's understanding of its Lifetime Value (LTV) metrics, retention rates, and churn rates to drive sustainable growth and competitive advantage in the market.

Target KPIs for Lucky Bet

1. Lifetime Value (LTV) Improvement:

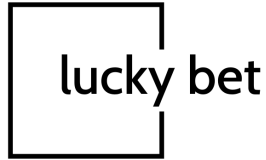
- Casino Segment: Increase the LTV from \$1,550 to \$1,700 within the next fiscal year.
- Sportsbook Segment: Boost the LTV from \$1,350 to \$1,500 in the same period.

2. Retention Rate Optimization:

- Aim to improve the 30-day retention rate to 95%, acknowledging the current 90% as a strong foundation.
- Increase the 60-day retention rate from 68% to 75%, addressing the critical drop-off point.
- Elevate the 90-day retention rate from 46% to 55%, focusing on long-term engagement strategies.

3. Churn Rate Reduction:

- Set a target to reduce churn to 20% at its lowest, with a stretch goal of not exceeding 30% even during fluctuating periods like new game launches or sporting seasons.



Long-term Business Objectives

1. Market Expansion and Leadership:

- Secure a top-three position in market share within key markets by the end of three years, through aggressive user acquisition and retention strategies.

2. Product Diversification:

- Launch new betting products and games every quarter to keep the platform engaging and reduce churn caused by market seasonality.

3. Technological Advancements:

- Invest in AI and machine learning to personalise user experiences, aiming to increase LTV and retention rates by providing tailored betting recommendations and notifications.

4. Global Expansion:

- Enter at least two new geographic markets each year, with a detailed analysis to ensure compliance and market fit, aiming to diversify revenue streams and leverage global sporting events.

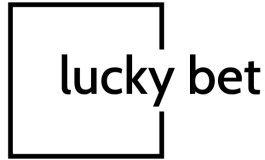
5. Responsible Gaming:

- Implement and promote responsible gaming features to not only comply with regulations but also to improve customer trust and loyalty, indirectly impacting retention and churn positively.

Measuring Success

Lucky Bet measures success through a combination of quantitative KPIs and qualitative assessments:

- **Financial Health:** Achieving and exceeding the targeted LTVs and maintaining a healthy cash flow from diversified revenue streams.
- **Customer Engagement:** Meeting or surpassing the retention rate goals and successfully reducing the churn rate, indicating that customers find value and satisfaction in the platform.



- **Market Position:** Gaining a significant share in targeted markets and being recognized as a leader in innovation and customer service.
- **Regulatory Compliance and Social Responsibility:** Adhering to all regulatory requirements in each market and promoting safe gambling practices, contributing to the company's reputation and long-term sustainability.

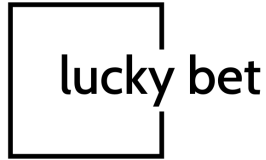
KPIs and business objectives around LTV, retention rates, and churn are essential for strategic planning and operational focus. By continuously monitoring these metrics, adapting strategies in response to performance data, and innovating in product and market development.

Policies And Procedures

Lucky Bet is committed to establishing a robust framework of policies and procedures that ensure compliance, promote responsible gaming, and protect our customers and the integrity of our operations. This section outlines our approach to the development, implementation, and oversight of these policies and procedures, demonstrating our commitment to regulatory compliance and ethical standards.

Development of Policies and Procedures

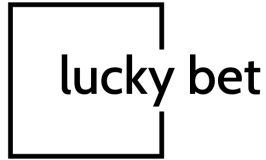
1. **Source of Development:** Lucky Bet's policies and procedures are developed both internally and externally. Internally, our dedicated compliance team, with deep industry knowledge and expertise, drafts policies tailored to our operational needs and the latest regulatory requirements. Externally, we collaborate with leading legal and regulatory consulting firms specialised in the iGaming and sports betting industry. This blended approach ensures that our policies are not only comprehensive and up-to-date but also reflect global best practices.
2. **Timelines and GCB Communication:** Lucky Bet is committed to a transparent and proactive relationship with the Gaming Control Board (GCB). We have established a timeline that includes regular updates and milestones for policy development and implementation. Key stages include initial drafting, internal review, external consultation, finalisation, and training. We pledge to keep the GCB apprised at each stage, with formal updates provided at least quarterly or as significant developments occur. The below timeline indicates a program that works with GCB and the regulatory framework.
3. **Qualification, Competence, and Conflict of Interest:** The team responsible for the development of policies and procedures is carefully selected based on stringent criteria of qualification and competence. Our internal team comprises seasoned professionals with extensive experience in iGaming and sports betting regulation,



compliance, and operational management. External consultants are chosen for their specialised expertise in specific areas, such as legal compliance, responsible gaming, and information security. We conduct thorough due diligence to ensure that there are no conflicts of interest, ensuring that the guidance provided is unbiased, objective, and solely in the best interest of Lucky Bet and its stakeholders.

Key Policy Areas

- 1. Customer Identification and Verification:** Our policies ensure rigorous customer identification and verification processes, adhering to KYC (Know Your Customer) principles. This includes the use of advanced technology for identity checks and ongoing monitoring to prevent fraud and comply with anti-money laundering directives.
- 2. Player Account and Fund Management:** We implement strict controls over player accounts and fund management, ensuring the integrity of player balances and transactions. Our policies cover account setup, fund segregation, and the secure processing of withdrawals and deposits.
- 3. Cash Transactions:** Cash transaction policies are designed to prevent money laundering and financial crimes. This includes limits on cash deposits and withdrawals, detailed record-keeping, and reporting of suspicious transactions.
- 4. Responsible Gaming:** Our responsible gaming policy is at the heart of our operation, promoting a safe and sustainable gaming environment. This includes self-exclusion tools, limits on deposits and play, and resources for obtaining help with problem gambling.
- 5. Information Security:** Information security policies protect customer data and ensure the confidentiality, integrity, and availability of our systems. We adhere to international standards for data protection and cybersecurity.
- 6. AML/CFT/CPF:** Anti-Money Laundering, Counter-Financing of Terrorism, and Counter-Proliferation Financing policies are strictly enforced. This includes comprehensive risk assessments, employee training, and cooperation with regulatory and law enforcement agencies.
- 7. Player Account Suspension and Closure:** Policies governing the suspension and closure of player accounts are clear and fair, providing mechanisms for the protection of players and compliance with regulatory requirements. This includes procedures for handling fraudulent activity, breach of terms, and responsible gaming concerns.



Lucky Bet is committed to upholding the highest standards of integrity, compliance, and responsible gaming through our meticulously developed policies and procedures. By ensuring these policies are developed by qualified and competent professionals, free from conflicts of interest, and in close communication with regulatory bodies like the GCB, we demonstrate our unwavering commitment to operational excellence and ethical conduct in the iGaming and sports betting industry.

Conclusion

In conclusion, Lucky Bet is strategically positioned to redefine the gambling industry through its innovative technology, commitment to customer satisfaction, and robust risk management framework. With a clear vision for market leadership, Lucky Bet leverages cutting-edge technologies and a comprehensive suite of gambling products to offer unmatched gambling experiences. The business plan outlines a solid foundation for growth, emphasising strategic marketing, affiliate partnerships, and continuous technological advancements. By prioritising customer engagement, regulatory compliance, and responsible gaming, Lucky Bet aims for sustainable growth and a distinguished presence in the global gambling market.