

DG INNOVATIONS B.V.

BUSINESS PLAN

Version 2.0

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1. OUR MISSION

DG Innovations B.V. is a Curaçao-incorporated online gaming operator established on 8 June 2023. The company focuses on developing and operating multiple online casino brands tailored to the preferences of the Turkish market. Each brand is designed to target distinct audience segments, enabling DG Innovations to diversify risk, improve acquisition effectiveness, and optimise long-term player value.

DG Innovations uses a fully outsourced technology model. The gaming platform, hosting environment, game content, and back-office tools are delivered through BetConstruct, a reputable international platform provider. This structure allows the company to maintain operational efficiency, scale responsibly, and ensure compliance with Curaçao regulatory expectations.

The company's mission is to build a sustainable, multi-brand operation supported by strong governance, proportionate AML/KYC frameworks, and a long-term commitment to responsible and secure gaming practices.

2. COMPANY & MANAGEMENT

2.1 Ownership & Governance

Ultimate Beneficial Owner (UBO):

Mr. Imad Shamsadin Saleh Ahmed

Responsible for strategic oversight, investment decisions, and overall commercial direction of the business. Mr. Ahmed also controls Dynamic Group N.V., creating operational synergies without operational dependency.

Corporate Service Provider (CSP) & Director:

Capital Trust Corporation N.V. (CTC)

Through its appointed director, CTC provides:

- statutory management;
- local Curaçao substance;
- corporate filings;
- governance oversight;
- regulatory communication.

The CSP ensures that DG Innovations maintains continuous management presence in Curaçao, in accordance with applicable legislative requirements.

2.2 Key Operational Functions

Compliance & AML Oversight

Compliance functions are supported by CTC and supplemented by external risk specialists where required. Responsibilities include AML/KYC monitoring, player verification checks, review of escalations, and regulatory record-keeping.

Brand & Commercial Management

Led by the UBO with support from contracted marketing partners. Roles include brand strategy, agent management, acquisition/retention oversight, and evaluation of marketing performance.

Technical Operations

Fully outsourced to BetConstruct, covering:

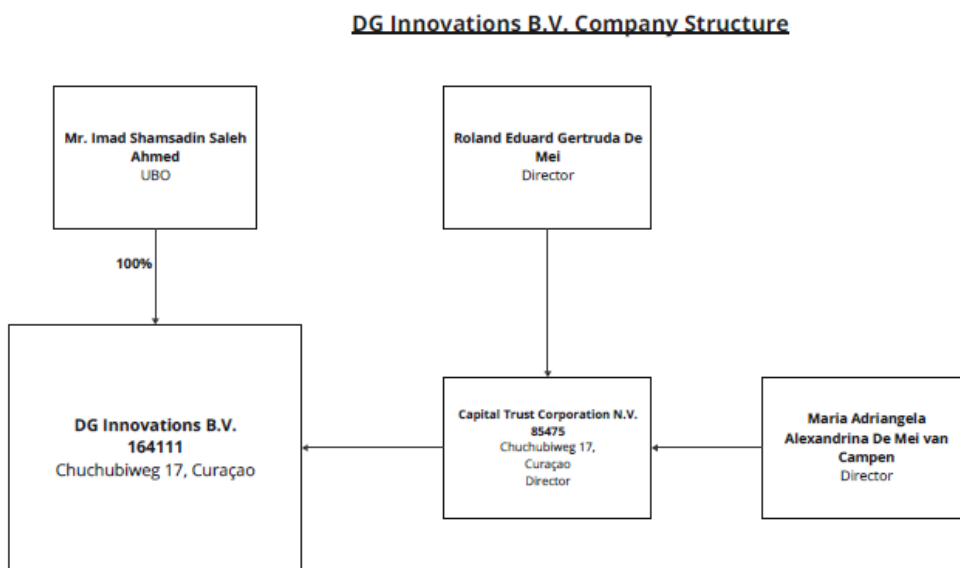
- server hosting & platform availability;

- game integrations and RNG certifications;
- reporting dashboards;
- payment integrations;
- platform security and monitoring.

Finance & Administration

CSP oversees statutory bookkeeping and filings. Commercial budgeting and planning are managed by the UBO.

2.3 Organisational Overview



2.4 Proportionality Statement

DG Innovations maintains a lean structure appropriate for its size and early-stage development. As operations expand and certain brands reach higher transaction volumes, the governance and compliance framework will be strengthened with additional internal and outsourced resources.

SECTION 3 — BUSINESS FORECASTS

DG Innovations operates several online casino brands targeting the Turkish market. The business is currently in a controlled early-stage phase, with brands live but receiving limited marketing activity as the company evaluates performance indicators such as conversion, retention, and payment routing. This soft-launch approach results in modest revenues, which is consistent with the company's development plan.

The projections below illustrate a responsible growth strategy with controlled expenditure, reflecting the company's operational scale. Losses remain within a manageable range, and breakeven is expected as the core brands mature and marketing efficiency increases.

3.1 Key Assumptions

- Exclusive focus on the Turkish market.
- Gradual activation of marketing based on early KPIs.
- Consolidation of the brand portfolio from seven active brands to five stable brands.
- Technical operations fully outsourced to BetConstruct.
- Compliance and AML oversight provided by the CSP and external specialists.
- Operating costs aligned with the company's current scale and early stage of development.

3.2 Three-Year Financial Projection (EUR)

Metric	Year 1	Year 2	Year 3
Active Brands	10 → 7	5	5
Total Deposits	140,000	310,000	450,000
Gross Gaming Revenue (GGR)	17,500	41,000	58,000
Bonuses	-1,500	-4,000	-6,000
Net Gaming Revenue (NGR)	16,000	37,000	52,000
PSP Fees	-7,400	-16,000	-23,000
Game Provider Fees	-3,500	-8,200	-11,600
Platform Fees	-2,600	-6,200	-8,700
Gross Profit	2,500	6,600	8,700
Marketing	-9,000	-13,000	-18,000
Regulatory Fees	-42,000	-42,000	-42,000

CSP Fees	-16,500	-16,500	-16,500
General OPEX	-11,000	-11,000	-11,000
Net Profit / (Loss)	-18,000	-15,900	-18,800

3.3 Interpretation

DG Innovations maintains a proportionate and sustainable financial structure suitable for its current development phase. Early-stage revenues remain limited due to restrained marketing expenditure, which is intentional while the company builds a reliable understanding of player behaviour and brand performance.

The outsourced platform model ensures efficient operations with a predictable cost base. As the core brands mature, deposits and Net Gaming Revenue are expected to increase gradually.

3.4 Breakeven Outlook

Breakeven is anticipated once:

- player conversion rates stabilise;
- marketing becomes more cost-effective;
- operational efficiencies improve;
- deposit volumes increase across the consolidated brand portfolio.

3.5 Funding Position

DG Innovations is supported by sufficient shareholder capital to sustain operations throughout the soft-launch phase. Additional funding can be made available to support growth as performance justifies expansion.

4. BUSINESS STRATEGIES

4.1 Market Strategy

DG Innovations focuses exclusively on the Turkish online casino market. The company follows a phased market-entry model in which traffic volumes are increased only after early performance metrics—such as conversion rates, retention behaviour, and PSP approval ratios—reach acceptable thresholds. This approach reduces early-stage financial risk and supports disciplined, data-driven scaling.

4.2 Brand Strategy

DG Innovations operates multiple brands that target different audience groups within the Turkish market. Each brand varies in design, value proposition, and promotional style to appeal to unique customer segments.

Several brands are currently in soft-launch mode and serve as test environments. Underperforming brands will be gradually phased out, while successful brands will receive increased investment. The objective is to stabilise at five strong core brands.

4.3 Acquisition Strategy

The acquisition strategy prioritises controlled, performance-based marketing. Key channels include:

- selected affiliate partnerships with clear ROI targets;
- search and social media placements;
- targeted influencer activity;
- retention tools tailored to each brand's player base.

Marketing expenditure will grow only when supported by performance data demonstrating sustainable player value.

4.4 Retention Strategy

Retention activity includes:

- structured bonus offers;
- free-spin incentives;

- loyalty rewards;
- periodic promotional campaigns tied to brand identity.

These measures are applied conservatively and in line with responsible gaming expectations.

4.5 PSP & Payments Strategy

DG Innovations uses multiple payment service providers that support locally preferred payment methods in Turkey. PSP selection is based on reliability, cost efficiency, AML controls, and transaction success rates. Payment routing is reviewed regularly to reduce fees and maximise deposit acceptance.

4.6 Operational Strategy

Technical operations are fully handled by BetConstruct. DG Innovations concentrates on:

- brand oversight;
- commercial planning;
- compliance monitoring;
- financial controls;
- supplier management.

The lean structure ensures efficient operations while maintaining appropriate oversight.

4.7 Compliance & Risk Strategy

The company adopts a risk-based compliance model in line with Curaçao requirements. Key elements include:

- identity verification at financial thresholds;
- sanctions and PEP screening;
- transaction monitoring;

- ongoing internal reviews;
 - maintenance of comprehensive audit trails.
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5. KEY PROVIDERS

5.1 Platform Provider

BetConstruct provides the platform infrastructure, including:

- hosting and server environment;
- game aggregation;
- back-office administration tools;
- technical monitoring;
- security controls;
- reporting and analytics.

5.2 Game Providers

Through BetConstruct, DG Innovations offers games from well-known providers such as:

- Pragmatic Play;
- Evolution;
- EGT;
- Spinomenal;
- additional providers available through the aggregation hub.

All content is licensed and certified for RNG integrity.

5.3 Payment Providers

DG Innovations works with multiple PSPs suited for the Turkish market. Each PSP is selected based on track record, technical reliability, compliance capabilities, and customer experience. Redundancy is maintained to ensure uninterrupted deposit and withdrawal processing.

5.4 Corporate Service Provider

Capital Trust Corporation N.V. (CTC) serves as the CSP and provides:

- statutory management;
- corporate governance support;
- regulatory filings;
- compliance oversight;
- local presence in Curaçao.

5.5 External Advisors

External specialists support AML, compliance, and operational risk management functions when required.

6. RISK EVALUATION & MANAGEMENT

6.1 Risk Overview

DG Innovations maintains a risk-based framework addressing the key operational, financial, compliance, and technical risks associated with online gaming. Risks are continually assessed and monitored, with controls applied proportionately to the company's scale.

6.2 Risk Matrix

Risk Category	Description	Impact	Likelihood	Mitigation Measures
AML/CTF	Suspicious financial activity or high-risk players	High	Medium	KYC, EDD, monitoring, sanctions/PEP screening
Compliance	Breach of regulatory or reporting obligations	High	Low	CSP oversight, documented procedures, monitoring
Technical	Platform outage or hosting disruption	Medium	Low	BetConstruct SLAs, backup systems
Payments	PSP downtime or routing failures	Medium	Medium	Multiple PSPs, routing optimisation
Operational	Underperforming brands or inefficient marketing	Medium	Medium	Brand consolidation, ROI-focused campaigns
Fraud	Chargebacks or bonus abuse	Medium	Medium	Risk tools, velocity checks, player monitoring

6.3 Ongoing Monitoring

The following are maintained:

- ongoing transaction reviews;

- periodic internal compliance reviews;
 - PSP performance tracking;
 - platform availability monitoring;
 - financial reporting and reconciliation routines.
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7. LEGAL & GOVERNANCE FRAMEWORK

DG Innovations operates under Curaçao corporate and gaming regulations. Governance is supported by the CSP and overseen by the UBO.

7.1 Governance Structure

- Statutory director: Capital Trust Corporation N.V.
- Local presence maintained through CTC's directorship.
- AML/KYC framework implemented and monitored.
- Policies kept under review and updated when required.
- All corporate filings and regulatory obligations handled through the CSP.

7.2 Documentation & Record-Keeping

DG Innovations maintains:

- AML/KYC logs;
- verification documentation;
- player activity records;
- incident logs;
- PSP statement reconciliations;

- internal policy updates.

7.3 External Oversight

External specialists may be engaged for:

- AML health checks;
 - compliance audits;
 - policy improvements;
 - operational reviews.
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8. BUSINESS OBJECTIVES & KPIs

8.1 Short-Term Objectives

- Complete consolidation of the brand portfolio;
- Strengthen PSP success rates;
- Improve conversion and retention metrics;
- Maintain operational costs at proportionate levels.

8.2 Medium-Term Objectives

- Expand the player base within the Turkish market;
- Grow deposits and NGR consistently;
- Improve marketing ROI;
- Enhance compliance maturity and internal governance.

8.3 Long-Term Objectives

- Achieve breakeven and progress toward profitability;
- Establish a stable portfolio of five strong brands;
- Maintain a robust compliance and risk management framework.

8.4 KPIs

Key indicators include:

- deposit volume;
 - net gaming revenue;
 - PSP approval rates;
 - retention rates;
 - marketing cost per acquisition;
 - customer activity ratios;
 - bonus utilisation and net impact.
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9. POLICIES & PROCEDURES

DG Innovations maintains policies covering all key operational and compliance areas, including:

- AML/CFT Policy;
- KYC & Player Verification Policy;
- Responsible Gaming Policy;
- Complaints and Disputes Procedure;
- Terms & Conditions;

- Privacy Policy;
- Internal operational guidelines.

Policies are reviewed periodically to ensure alignment with Curaçao's regulatory expectations and the company's operational profile.