

BUSINESS PLAN

GRACE BA

APRIL 202

BUSINESS PLAN

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1. EXECUTIVE OVERVIEW

1.1. Company Background

In the last two years Grace Bay brand 'Tipobet365' has established itself into an online leader. With around ten million in sale revenue per month the company is one of the best operations of the shareholders. The shareholder holds a few companies each with its own team and focus and divided from a risk perspective.

Equipped with a full range of sports betting and casino products the company is constantly investing in order to retain its status in the industry.

The Company currently employs around seventy employees with offices in various countries around the globe.

The company currently operates under a master license in Curacao and shall be seeking to obtain a licence under the reformed Curacao online gambling legislation, namely "*Landsverordening op de kansspelen*" ('LOK'), once this has been rolled out by the competent authority/ies.

The Company, together with its management and ownership, is excited by the positive changes which will be brought about by the new regulatory framework which, *inter alia*, will facilitate the strengthening of key areas including AML, player protection, transparency and data security which will therefore undoubtedly bolster the sustainability of the jurisdiction's gaming industry going forward.

The Company also anticipates that the said regulatory overhaul (and simultaneous introduction of LOK) will facilitate the negotiation of more advantageous commercial and contractual terms with strategic business partners and key service providers, including software partners and payment platforms. The Company's belief is that the new regulatory regime will therefore enhance the global reputation of the iGaming industry in Curacao and the privilege of being licensed under the new LOK will, in turn, strengthen the Company's own reputation, enabling it to increase and improve its service offering across the board including better branded games and better payment options.

1.2. Current Operational Status

The company is currently expanding operations into several countries to keep sustaining growth in a number of areas and diversification. With a full range of sports betting, esports, casino games, full suite of live casino and poker the company indeed has a product for each player.

The company currently has a thorough operations with over seventy employees globally with a few different departments such as accounts, fraud/risk, operations, customer care, marketing and odds monitoring. The company ensures that players are treated honestly and fairly and thus each client is segmented accordingly. The company offers a 24/7 customer support and ensures that clients are handled in the earliest possible times.

The company also has a responsible gaming department who already close off players and limit despite not being in current legislation. The company gives responsible gaming utmost importance.

1.3. Objectives and Expansion Plans

The Asian market is known to be the largest globally and we believe that by increasing our brand awareness and offering incentives to players to attract new players are key to our continue growth in the market. Working closely in the social space together with sponsorships and affiliate agreements we believe that we can continue our continued growth in the market. The company will keep investing in new languages and markets in order to keep establishing itself in the industry.

Over the next three years the company intends to increase its reputation in the region by increasing in popularity. This is partly in our opinion due to LOK.

Through the approval of the LOK the company intends to maximize payment options, increase the game selection and target new markets. The company intends to increase sponsorships, affiliate agreements and social media buy ins as part of its marketing plan.

Another obvious point of key importance was Curacao robust and flexible taxation framework. Attractive corporate taxation regime for companies belonging to foreign holding structures appeared highly beneficial to the existing setup. Besides corporate level, gaming tax structure appears highly beneficial to solution provider.

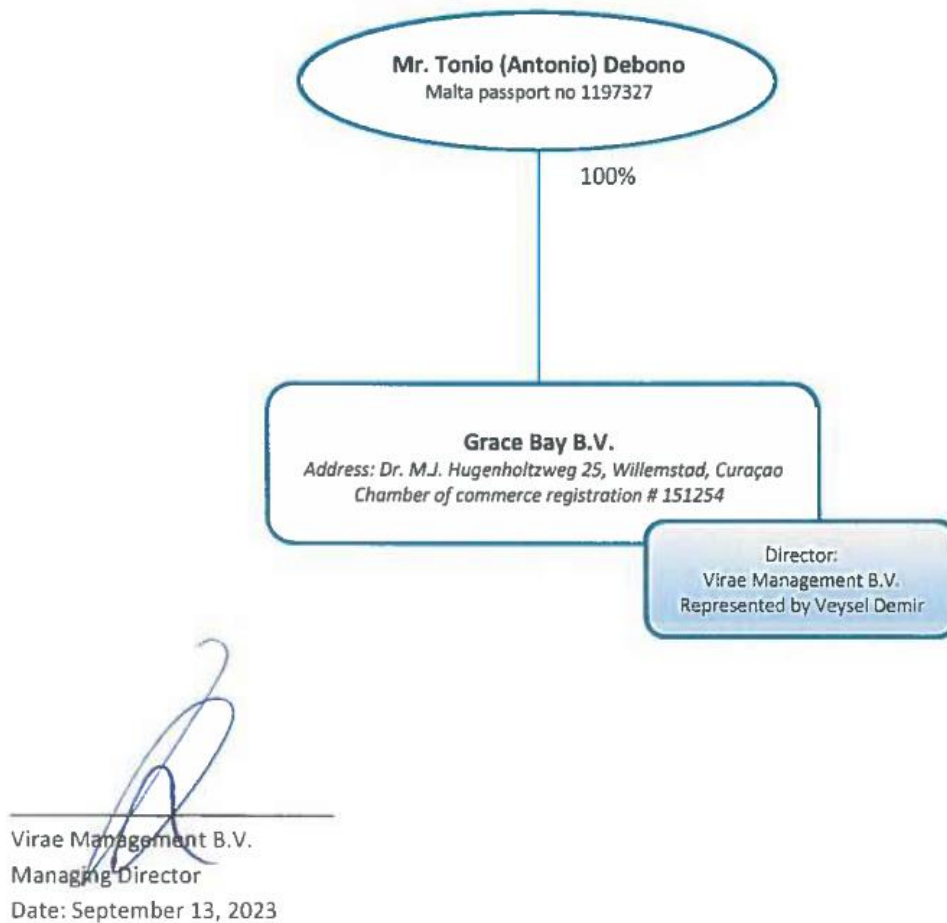
A Combination of the abovementioned factors sealed the decision for establishing presence in Curacao with goal of applying for a LOK License.

2. COMPANY STRUCTURE

2.1. Company Structure for Market Entry Stage

The company has a simplified structure.

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2.2. Shareholding Structure

Group founder currently owns 100% stake in shares of the company.

2.3. Product Overview

The company has an agreement with B2B applicant Daintree Interactive B.V. Through this platform the company is able to offer a full wide range of sporting events, popular casino games such as Evolution, Pragmatic, Wazdan, Netent, No Limit City, Endorphina.

Also, the company has recently launched bingo to ensure it caters for all player categories.

The platform also contains real-time reporting systems ensuring that the risk, operations, and payments themes are constantly up to date on potential exposures etc. With the introduction of LOK we believe that more internationally renowned content will be available to Curacao operators thus the company will be able to offer a wider range of products to its database.

3. MARKETING PLAN

3.1. Marketing Plan

The company has since extraordinary growth since its launch. With over ten million in sales revenue per month the main intention is to retain the current growth whilst focusing on player retention, player reactivation and incentives to keep the brand growing. The company is involved in several online sponsorships and online affiliate agreements to sustain its growth.

Additionally, the marketing team is constantly in search of new partnerships and ventures in joint venture arrangements to ensure smooth growth.

With the retention of clients, refer your friends campaigns and other marketing incentives the company is able to sustain its growth at reduced costs.

4. SWOT ASSESSMENT

4.1. Strengths

Established and reputable in the region, the company has to keep working to ensure it retains its database and increases accordingly.

4.2. Weaknesses

Changes to the new LOK has brought around uncertainties thus understanding the new requirements is key for our operations.

4.3. Opportunities

The company intends to meet more stakeholders and grow its marketing team in the region thus increase and maintain its database.

4.4. Threats

With the introduction of regulation in certain countries and potential blocking the company must evaluate its position in certain countries and analyze accordingly.

5. TECHNICAL SET-UP

5.1. Software Development Methodology and System Architecture

The system is designed in a manner ensuring minimum downtimes together with a robust infrastructure. Security is of utmost importance to the company and the tech team is fully committed to ensuring that the

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highest level of security is given to the system.

Developers have ensured that the platform provides faster delivery of software products and features, customer satisfaction, better adaption to rapidly changing requirements and respond faster. The platform ensures that customer satisfaction and real time reporting is essential in today's gaming market.

5.2. Server Infrastructure

The servers are hosted in Hetzner Germany. The company is renowned for its scalable cloud solutions with unshared vCPU power. The colocation center is part of the ISO 27001 Hetzner Online Data Park.

Electricity capacity of 1200 kVA. Uninterruptible power supply (UPS) is guaranteed by a 15-minute battery capacity and emergency diesel generators. All UPS systems are designed redundantly.

24/7 access via a transponder key controlled security lock. Logging of access and setting permissions within the administration interface. High security standards and early fire detection throughout the data center park. Protected network through DDoS protection. Connections to central Internet exchanges, such as DE-CIX and AMS-IX as well as redundant connectivity to national and international carriers. All upstreams and peering's are integrated into the backbone via state-of-the-art routers from Juniper Networks. Guaranteed network availability of at least 99.9%.

Operating systems are updated periodically to make most recent security updates available. Access to parts of infrastructure accessible by third-party providers are protected by robust login/password credentials and overviewed for the security concerns. From time-to-time security monitoring is performed for servers and APIs to ensure setup remains secure.

Ability to login to production environments is limited to personnel with relevant level of permission. Only senior level employees have spatial access to all systems across the platform. The rest are limited to specific modules and parts of platform they are working on. The core servers are connected only to the internal network.

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6. FINANCIALS

Attached are the company's accounts.

7. PAYMENTS

Crypto – Moneybite

Payments – Payfix