

MAKABA SPORTING B.V. T/A MSC Online Casino
“Business”
Business Plan.

Submitted by:

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Executive Summary;

Msc Online Casino is focusing on expanding its user base in Europe by entering international regulated markets. The company's strategy involves targeting the Latam markets followed by expansion into regions where AML regulations are strictly followed without compromising the licence from the GCB. The games offered by MSC Online Casino cater to an audience with no specific client target group being emphasised.

Based on our projections under the base scenario we expect the company to achieve profitability by 2024 upon obtaining a licence from GCB.

MAKABA SPORTING plans to launch a website at <https://msccasino.com/> and operate under the brand name Msc Online Casino.

Business Overview and Background;

MAKABA SPORTING B.V., (hereinafter referred to as “the Msc Online Casino”) has been established under Curacao laws. Intends to apply for the necessary gaming licence from GCB.

Vision and Mission;

The vision of Msc Online Casino is to develop a tier online gambling platform that can rival leading global brands. Our goal is to deliver a gambling experience for our customers.

Msc Online Casino is an online sports betting platform created by a skilled team of experienced individuals. The casino offers a range of top notch games and incorporates AI technology to cater to players' needs effectively.

We view gambling as a form of entertainment. Aim to provide a user friendly platform that adapts seamlessly to your preferences.

Why Choose Curacao?

By obtaining a Curacao Gaming License Msc Online Casino aims to strengthen its edge in the iGaming industry paving the way for new business opportunities. The licence not adds an internal competitive advantage due to our expert team but also provides external benefits, including;

- ❖ Curacao's esteemed reputation in the iGaming sector
- ❖ Being the first country to regulate iGaming
- ❖ Robust hosting infrastructure
- ❖ Attractive corporate tax rates

Curacao is recognized as a premier location for iGaming operators due to its comprehensive regulatory environment. With regulatory updates from the GCB we are committed to setting new industry standards. Msc Online Casino is poised to lead by being, among the recipients of these licences.

What is Msc Online Casino

Msc Online Casino is a gambling platform where players engage with fellow casino and sports fans in a safe and secure environment. Fans will be allowed to bet on their favourite events as well as enjoy a casino. Typical games that the fans enjoy are Soccer, Tennis, Basketball and other major sports. The goal is to have an active community, in which players can watch and play a variety of games and events. The

team is dedicated to communicating with the community on all levels, including but not limited to; Analysts that provide deep insight in the growing sports genre, active support of grassroots movements, and transparent partnerships with established institutions.

- ❖ Unique Sales Proposition
- ❖ 24|7 customer care service
- ❖ instant withdrawals
- ❖ Mobile-friendly
- ❖ Welcome bonuses and ongoing promotions
- ❖ Loyalty program that automatically gives rewards (will be launched soon)
- ❖ A variety betting options
- ❖ multiple languages

Market analysis Summary

The online gaming market is rapidly expanding, becoming a significant segment within the gambling industry. As customers increasingly turn to the Internet for sports betting, slot games, and card playing, the traditional gambling model is evolving. Despite potential political and legislative constraints, the market shows potential for further growth as new regions open up and governments become more accepting of online gambling. The global growth of professional sports and associated betting markets, driven by technological advancements and consumer demand, mutually benefits both industries financially.

The iGaming industry is constantly evolving, requiring gaming operators to adapt to new developments in the market. Many countries are pursuing self-regulation approaches to ensure player protection and generate tax revenue from gaming activities. The industry continues to expand at a rapid pace, with new operators seeking market shares in their respective countries. Although the European market appears fragmented, with each country implementing its own regulations, countries like Denmark, Spain, France, and Italy have introduced individual iGaming legislations for market regulation.

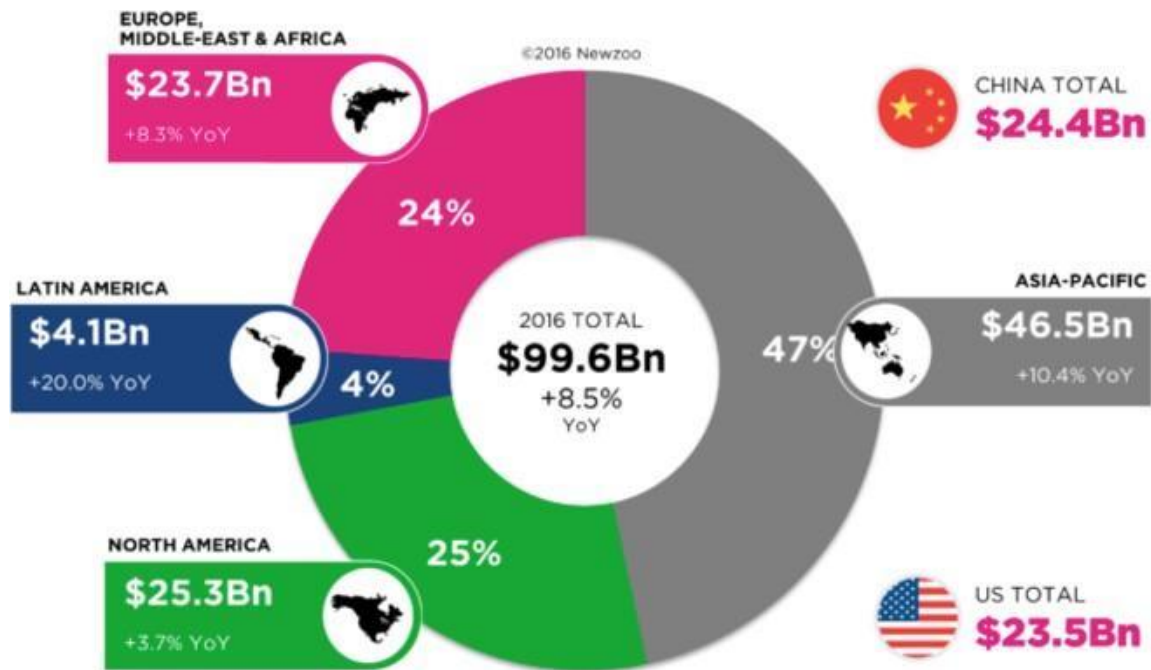
Despite the global recession and the bombardment of advertisements through various channels like TV and the Internet, the gaming industry remains resilient and continues to grow, much to the satisfaction of gaming operators. Additionally, the iGaming industry is witnessing a surge in social and skill-based games. Operators are embracing this trend and constantly expanding their gaming portfolios with new games. Social games are gaining popularity among youth and young adults, creating fertile ground for further industry growth. The industry perception has shifted from purely gambling on games of chance to incorporating economic value, with players finding pleasure and enthusiasm in these games. Although regulations for these types of games are not yet fully established, many jurisdictions, including Curacao, are moving towards regulating these segments. Curacao is set to introduce new legislation to regulate social and skill-based games in the near future.

Market Segmentation

Online gambling has proven to be a global phenomenon. Currently, Europe appears to be the third expanding online gambling market. In 2016, European online gambling business operators recorded almost a 24% increase in the total online gaming yield.

The largest market in the iGaming industry is Pacific Asia followed by North America. US legislation is easing out on its prohibition about online gambling in some sectors and territory and is therefore experiencing a massive growth.

The chart below illustrates the global online market growth tendencies:



Target Market Segment Strategy

After a deep review of the International Online Survey prepared by Ontario Problem Gambling Research Centre, we will be trying to attract and hold with us operators which main target will include:

- ❖ The typical online gambler - mature, well-educated, and solidly middle-class head of household.
- ❖ Both genders are gambling for entertainment during their free time using their own computers and Internet traffic.
- ❖ Both Genders who are willing to choose Slots and other simple online games.

Why we are applying for an GCB License

The iGaming industry has experienced tremendous and swift growth since 1990, leading to an increasing number of operators entering the gaming market. From the early 1990s onwards, numerous operators actively participated in specific markets and established themselves as prominent online operators worldwide. Curacao has been chosen by a plethora of iGaming companies due to its appealing factors, which include:

- ❖ Curacao is one of the few countries which regulates remote gaming sensibly.
- ❖ Online Gaming in Curacao has a reputation of being operated out of a well-regulated jurisdiction which safeguards the interests of both operators and players
- ❖ A very attractive fiscal regime
- ❖ An efficient and relatively inexpensive Curacao gaming licence process
- ❖ Established financial services institutions (including payment gateways) for gambling companies
- ❖ State-of-the-art telecommunications infrastructure

The issue

Many existing platforms are operating without being properly regulated, and others operate outright illegally. The traditional bookmakers who are compliant do not have the full understanding of how vulnerable the new generation is, and how they have been groomed to become bettors by the game creators. The intertwinement of sports and iGaming is inevitable, so doing it the right way is extremely important. When so many operators shy away from regulations and have a lack of compliance, it will eventually create big problems.

The solution

Msc Online Casino will solve the problems outlined by being a fully licensed gambling platform dedicated to the sports market. Compliance with the highest levels of regulation will enable Msc Online Casino to lead the way into the future, for a safer and better player experience. The team represents a broad spectrum of specialisation, across management, technology, product, design, operations and marketing. By creating a great player experience, offering a fully legal and safe place to play, Msc Online Casino not only ensures that players are safe, but also that we are able to work with leading B2B partners to make sure the evolution of gaming is headed in the right direction. Integrity, transparency and accountability underpin Msc Online Casino operations and these sound foundations will not only help create a great player experience but also put the business in a strong position to grow. All decisions will be made to optimise player experience, prioritising lasting relationships over short-term gains, and ensuring that the vulnerable and underaged are shielded. Through the support of discerning partners and the commitment and drive of our knowledgeable industry executives, we aim to be the business that takes the front-row position in creating a safe and fun environment for everyone in the sports gambling market and to achieve this we will:

Continue to improve our framework to ensure people do not develop a gambling addiction
Use key influencers in the esports community to educate potential problem gamblers
Work closely with regulators to continuously improve self-exclusion and player limits
Keep refining our engaging platform for players to create a sustainable gaming community

Website Marketing Strategy

Msc Online Casino will be using below strategies for generating bigger traffic on its website:

- Search Engine Optimisation (SEO). This involves producing web pages that rank well in the search engines on relevant keywords.
- Advertising. Msc Online Casino will start with Google Adwords, which provides a low-cost entry into the internet advertising market.
- Inbound links from directories, journals or other online publications.
- Secret squirrel marketing. By taking part in newsgroups, forums, email lists etc
- Pay-Per-Click (PPC) promotion Services

Marketing Strategy

Msc Online Casino intends to use a high impact marketing campaign which will focus on direct marketing of games to players that will generate a substantial amount of traffic on its web sites.

These strategies include the use of search engine optimization and possibly pay per click marketing. The Company's web development firm will place large amounts of linking text on the Company's website in order to achieve the best web access (ideally on the first 5 pages of Google). This strategy is technically complicated, and Msc Online Casino will use a search engine optimization firm to develop the Company's visibility on a non-paid basis. Msc Online Casino expects that the outsourcing company will place large amounts of linking data and text specific keywords into the business's website, which will allow the Company to appear more frequently among search engines. Additionally, the Msc Online Casino will use several pay methods for increasing the Company's visibility. This strategy is expensive, but the results can be phenomenal if this marketing strategy is properly executed. These advertisements appear along the border and side of a website, and each time a person clicks on the website, a small fee is charged to the Company's account. This strategy will be used until the Company gains momentum. Beside Internet Marketing, Msc Online Casino will be paying for ad space in the industry leading magazines. This will give us a chance to exactly specify when that ad will air or be published.

SWOT Analysis

The SWOT analysis provides us with an opportunity to examine the internal strengths and weaknesses Msc Online Casino must address. It also allows us to examine the opportunities presented to Msc Online Casino as well as potential threats.

Msc Online Casino has a valuable inventory of strengths that will help it succeed. These strengths include: Exclusive access to the highly effective platform, flexibility in making software changes, excellent know-how and a clear vision of the market need. Strengths are valuable, but it is also important to realise the weaknesses Msc Online Casino must address. These weaknesses include for example: a weak brand name, very high-cost factor associated with sustaining servers and Internet access and strong competition.

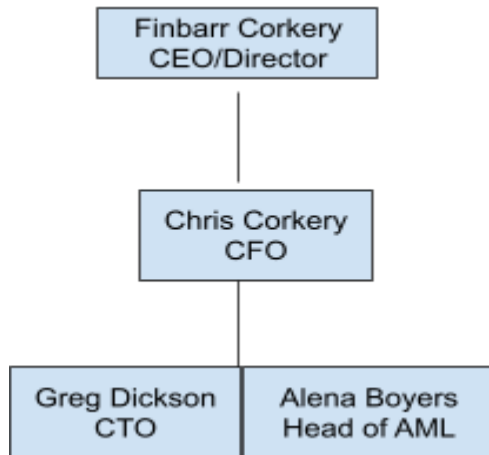
Msc Online Casino strengths as being a recognised Land based Casino in Ireland will help it capitalise on emerging opportunities. These opportunities include, but are not limited to, a growing population of daily Internet users, and no international trade barriers. Threats that Msc Online Casino should be aware of include fast changing technology and new regulations and legislations.

Company shareholding structure

Please refer to the Due diligence pack

Organisational chart

The below is the high-level organisation structure.



Key personnel and key functions' competence

All our personnel are employed with several years of industry experience. They have been active in various tasks in the gambling sector, from game production to online casino marketing. Therefore, our people have been actively involved in day-to-day business in all the supply chain of this business concept.

CEO/UBO- Finbarr Corkery

Finbarr has been working in the gaming industry for a number of years . He has very strong connections in the industry and a deep analytical mindset with highly resourceful skills. He worked in a land based casino for many years and he has experience in managing and growing highly efficient teams and making strategic decisions for complicated and costly projects.

Responsible for:

- ❖ Develop, implement, and enforce compliance policies and procedures.
- ❖ Monitor and assess the organisation's adherence to relevant laws and regulations.
- ❖ Conduct regular compliance risk assessments.
- ❖ Provide guidance to employees on compliance matters and conduct training programs.
- ❖ Investigate and address reported compliance concerns or violations.
- ❖ Collaborate with other departments to ensure consistent compliance practices.
- ❖ Stay informed about changes in laws and regulations affecting the industry.
- ❖ Establish and maintain effective communication channels for reporting compliance issues.
- ❖ Conduct periodic internal audits to assess and improve compliance programs.
- ❖ Interact with regulatory authorities and respond to inquiries or audits.
- ❖ Evaluate and approve business practices to ensure compliance.
- ❖ Design and implement systems for monitoring and reporting compliance metrics.
- ❖ Develop and update compliance manuals, codes of conduct, and related documents.
- ❖ Oversee the implementation of compliance-related technology solutions.

- ❖ Provide regular compliance reports to senior management and the board.
- ❖ Ensure that the organisation's policies align with ethical standards and industry best practices.
- ❖ Participate in the development of risk management strategies.
- ❖ Collaborate with legal counsel to address complex compliance issues.
- ❖ Lead the response to regulatory changes and ensure timely updates to policies.
- ❖ Maintain records and documentation related to compliance activities.
- ❖ Act as a point of contact for employees seeking guidance on compliance matters.

CFO -Chris Corkery

He has been in the gambling sector for the last number of years. Chris has always shown and delivered the organisation of effective financial control system, budget planning and cash flow management

Responsible for:

- ❖ Develop and manage the organisation's financial strategy and policies.
- ❖ Oversee financial planning, budgeting, and forecasting processes.
- ❖ Manage and optimise the organisation's capital structure.
- ❖ Ensure accurate and timely financial reporting.
- ❖ Supervise accounting functions, including accounts payable and receivable.
- ❖ Implement and maintain effective internal controls.
- ❖ Assess and manage financial risks.
- ❖ Conduct financial analysis and provide insights to support decision-making.
- ❖ Liaise with external auditors and ensure compliance with accounting standards.
- ❖ Manage relationships with financial institutions and stakeholders.
- ❖ Evaluate and oversee investment strategies.
- ❖ Monitor cash flow and liquidity.
- ❖ Lead financial negotiations and agreements.
- ❖ Provide leadership and guidance to the finance team.
- ❖ Participate in strategic planning and decision-making processes.
- ❖ Stay informed about changes in financial regulations and industry trends.
- ❖ Develop and implement cost-saving initiatives.
- ❖ Evaluate and recommend financial technologies for improved efficiency.

Data Protection Officer (DPO) – to be appointed

Adherence to applicable legislation relating to data protection and privacy;

Responsible for:

- ❖ Oversee and ensure compliance with data protection laws and regulations.
- ❖ Develop, implement, and manage data protection policies and procedures.
- ❖ Conduct regular data protection impact assessments.
- ❖ Provide guidance and training to employees on data protection matters.
- ❖ Respond to and manage data subject access requests.
- ❖ Monitor data processing activities for compliance with privacy policies.
- ❖ Collaborate with other departments to embed privacy by design principles.
- ❖ Stay informed about changes in data protection laws and industry standards.
- ❖ Act as the point of contact for data protection inquiries and concerns.
- ❖ Work with IT and security teams to implement and maintain data security measures.
- ❖ Conduct audits to assess and improve data protection practices.
- ❖ Ensure that data processing agreements and contracts comply with data protection requirements.
- ❖ Collaborate with legal counsel to address complex data protection issues.
- ❖ Oversee and manage data breach response and notification procedures.

- ❖ Maintain records and documentation related to data protection activities.
- ❖ Assist in the development of privacy impact assessments for new projects.
- ❖ Coordinate with external regulators and authorities on data protection matters.
- ❖ Provide reports on data protection compliance to senior management and the board.
- ❖ Monitor and assess third-party data processing activities for compliance.
- ❖ Implement processes for managing data retention and deletion.
- ❖ Act as a liaison between the organisation and data protection authorities.

Chief Technical Officer (CTO) – Greg Dickson

The technological affairs of Msc Online Casino, including but not limited to the management of the back end and control system holding essential regulatory data;

Responsible for:

- ❖ Lead technology strategy and innovation.
- ❖ Oversee the development and implementation of IT policies and procedures.
- ❖ Manage the organisation's technology infrastructure.
- ❖ Ensure data security and compliance with relevant regulations.
- ❖ Supervise software and hardware development teams.
- ❖ Evaluate and implement technology solutions for business efficiency.
- ❖ Collaborate with other departments to align technology with business goals.
- ❖ Provide leadership and guidance to the IT department.
- ❖ Assess and manage technology-related risks.
- ❖ Stay informed about emerging technologies and industry trends.
- ❖ Plan and execute technology projects within budget and timeline.
- ❖ Liaise with external vendors and partners.
- ❖ Manage relationships with technology service providers.
- ❖ Lead disaster recovery and business continuity planning.
- ❖ Collaborate with cybersecurity teams to enhance digital security.
- ❖ Participate in strategic planning and decision-making processes.
- ❖ Conduct technology-related training programs for staff.
- ❖ Ensure IT support services are efficient and responsive.
- ❖ Coordinate with legal and compliance teams on technology-related matters.
- ❖ Develop and maintain IT budgets and financial forecasts.
- ❖ Promote a culture of innovation and continuous improvement within the IT department.
- ❖ Evaluate and recommend technology investments for the organisation.
- ❖ Maintain documentation of technology systems and processes.
- ❖ Act as a point of contact for technology-related inquiries and concerns.

Head of AML – Alena Boyers

Responsible for:

- ❖ Develop, update, and implement AML policies and procedures.
- ❖ Conduct risk assessments to evaluate money laundering and terrorist financing risks.
- ❖ Provide training and awareness programs for employees on AML policies and procedures.
- ❖ Oversee customer due diligence (CDD) processes, ensuring proper identification and verification.
- ❖ Implement systems for monitoring transactions and promptly report suspicious activities.
- ❖ Act as the point of contact for employees reporting suspicious transactions.
- ❖ Maintain comprehensive records of customer transactions and AML-related activities.
- ❖ Monitor and assess the effectiveness of the organisation's AML program.
- ❖ Recommend improvements to the AML program as needed.

- ❖ Serve as the primary contact for regulatory authorities on AML compliance matters.
- ❖ Respond to regulatory inquiries and provide necessary documentation.
- ❖ Regularly report to senior management and the board on AML compliance status.
- ❖ Stay informed about changes in AML laws, regulations, and industry best practices.
- ❖ Establish and manage a confidential reporting mechanism for whistleblowers.
- ❖ Collaborate with other departments, such as legal, compliance, risk management, and internal audit.
- ❖ Conduct periodic reviews and audits of the AML program for improvement and ongoing compliance.
- ❖ Ensure adherence to international AML standards and recommendations.
- ❖ Work with the IT department to integrate advanced technology solutions for AML monitoring and reporting.

Risk Evaluation Process

Msc Online Casino places a strong emphasis on effective risk management, following a comprehensive Risk Management Model outlined in the dedicated Risk Management Policy document. The Board of Directors and C-level Management, as key stakeholders, play a crucial role in overseeing and approving changes to this policy. Any adjustments to operating procedures, standards, guidelines, and technologies, consistent with the policy, may be authorised by the Chief Executive Officer.

The Board of Directors has the authority to approve the policy and undertakes annual reviews for ongoing merit. C-level Management is tasked with implementing and administering the directives in accordance with the approved policy. The Chief Executive Officer, along with all employees, bears the primary responsibility for enforcing the policy and its operating procedures.

Importantly, the policy and its procedures do not contravene or supersede any other legal or regulatory requirements imposed on Msc Online Casino

Msc Online Casino advocates for effective communication, transparency, and active participation from all key stakeholders in its model risk governance. This includes the encouragement of effective challenges to model-related processes, such as risk analysis, validation, testing, development, and governance. The Board of Directors, Chief Executive Officer, and Senior Management are tasked with fostering an environment conducive to such challenges.

Appropriate change management processes are integral to model governance, particularly when implementing or altering models and related technologies. These processes cover various areas, including model development, personnel, policies, testing and validation, IT systems, regulatory requirements, and internal controls. Msc Online Casino may engage third-party experts with specialised technology knowledge to ensure effective third-party risk management.

The Board of Directors and Head of AML are fully informed about relevant facts, comprehend associated risks, deliberate on significant issues, independently make decisions in Msc Online Casino best interests. This diligent approach ensures accountability and transparency in the company's model risk management practices.. Any adjustments to operating procedures, standards, guidelines, and technologies, consistent with the policy, may be authorised by the Chief Executive Officer.

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Legal Framework

Decisions pertaining to the Risk Management at Msc Online Casino are exclusively within the purview of the esteemed Board of Directors and C-level management. The governance structure ensures a clear delineation between major strategic decisions and day-to-day operations. The latter, aligned with the Risk Management Policy and other board-approved policies such as KYC, AML, and Compliance, is the responsibility of the C-level management.

To prevent potential deadlock situations, the CEO holds the controlling vote.

The C-level management, as a practice, diligently updates the Board of Directors on significant business developments during quarterly board meetings, facilitating a seamless flow of information between the top-tier executives and the governing body.

Legal support and advice form a crucial component of Msc Online Casino decision-making processes. The company engages multiple corporate service providers and legal firms, each chosen based on their jurisdictional expertise relevant to the specific issue at hand. This strategic approach ensures that legal guidance is not only comprehensive but also tailored to the intricacies of the regulatory landscape in various jurisdictions.

The quarterly updates and transparent communication channels established between the Board of Directors and C-level management underscore the commitment to robust corporate governance. These measures contribute to informed decision-making, effective oversight, and the adherence to legal and regulatory standards, further fortifying Msc Online Casino commitment to excellence in risk management and corporate governance.

Policies and Procedures

In line with our dedication to following regulations and being transparent, Msc Online Casino commits to providing all necessary policies and procedures to the appropriate authorities within six months after receiving the licence. This timeline reflects our commitment to promptly sharing our thorough framework with the Gaming Control Board (GCB) for their review.

By sticking to this schedule, we demonstrate our responsible governance approach and our pledge to meeting all regulatory requirements in a timely manner. Msc Online Casino values the importance of aligning with industry standards and regulations and delivering the full set of policies and procedures within the specified timeframe underscores our dedication to regulatory compliance.

We recognize that timely submission of these documents is vital for establishing a strong basis for operational excellence. Hence, Msc Online Casino diligently works on finalising and refining our framework to ensure it aligns with gaming industry requirements and upholds top notch corporate governance standards.

Through submitting our policies and procedures within six months post licence issuance, Msc Online Casino aims to support a thorough evaluation by relevant authorities, allowing them to assess our dedication to compliance and adherence to industry norms.

Ensuring trust, transparency and compliance with gaming regulations is essential to us. At Msc Online Casino, we commit to submitting all necessary policies and procedures to the authorities within six months of receiving the licence. This reflects our strong focus on regulatory adherence and our proactive stance in meeting obligations promptly.