

WG Curacao B.V. Business Plan

Version	1
Date of version	27/02/2024
Created and approved by	WG Curacao B.V. Team
Confidentiality level	Restricted

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Executive summary

WG Curacao B.V. showcases proprietary intellectual property on their website (wicked.games). This includes unique technologies, designs, or content that distinguishes the business from competitors in the gaming industry.

Business Summary and History

WG Curacao B.V. is a dynamic startup based in Curacao, specializing in providing advanced software solutions to licensed online gaming operators. Under the leadership of owner Trevor De Giorgio, a highly experienced professional with a distinguished career in legal, compliance, and regulatory affairs within the gaming industry, the company is poised to make significant strides in the online gaming sector.

The company's core mission is to deliver superior software solutions to licensed online gaming operators, with a primary focus on Business-to-Business (B2B) services.

WG Curacao B.V. offers a comprehensive suite of online gaming services, including online casinos, with plans to expand into live casino offerings in the future. The company's target markets include Switzerland, Greece, and Finland, where it aims to establish a robust presence and cater to the growing demand for online gaming entertainment.

With a strong emphasis on innovation, regulatory compliance, and customer satisfaction, WG Curacao B.V. strives to emerge as a leading provider of online gaming software solutions, delivering unmatched experiences to both players and operators alike.

Vision and Mission

Vision: WG Curacao B.V. aims to become a leading provider of innovative online gaming software solutions, recognized for its commitment to excellence, regulatory compliance, and customer satisfaction.

Mission: Our mission is to deliver superior software solutions to licensed online gaming operators, focusing on innovation, regulatory compliance, and customer-centricity. We strive to provide unmatched experiences to players and operators, establishing a strong presence in target markets such as Switzerland, Greece, and Finland, while pursuing growth opportunities globally.

Why Curacao and why we are applying for GCB license

Applying for a Curacao license as a Business-to-Business (B2B) operator offers several advantages:

- **Regulatory Compliance:** Obtaining a license from the Curacao Gaming Control Board (GCB) demonstrates a commitment to regulatory compliance. This can enhance trust and credibility among potential clients, who may prefer to work with licensed partners to mitigate regulatory risks.
- **Market Access:** The Curacao license provides access to a wide range of markets where online gambling is legal or regulated. This includes jurisdictions that recognize Curacao licenses as sufficient for operating online gambling businesses, thus expanding the potential client base for B2B services.
- **Reputation:** Operating under a reputable license can enhance the reputation of the B2B operator. It signals professionalism, adherence to industry standards, and a commitment to integrity, which can attract quality clients and foster long-term partnerships.
- **Legal Protection:** A Curacao license provides legal protection for the B2B operator and its clients, offering a framework for resolving disputes and ensuring fair business practices. This can help mitigate risks associated with operating in the online gambling industry.
- **Competitive Advantage:** Holding a Curacao license sets the B2B operator apart from unlicensed competitors. It demonstrates compliance with regulatory requirements and adherence to industry best practices, which can be compelling factors for potential clients when choosing a service provider.

Business Growth Strategy Overview:

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- **Market Expansion:** WG Curacao B.V. should focus on expanding its presence in existing target markets such as **Switzerland, Greece, and Finland**. This can involve targeted marketing efforts, establishing partnerships with local operators, and adapting products and services to meet the specific needs and preferences of each market.
- **Product Diversification:** In addition to online casinos, the company should consider diversifying its product offerings to include live casino solutions, sports betting platforms, and other gaming verticals. This can help attract a broader range of clients and capture a larger share of the online gambling market.
- **Strategic Partnerships:** Forming strategic partnerships with other companies in the gaming industry can provide access to new markets, technologies, and resources. Collaborating with established operators, software providers, or regulatory bodies can help accelerate growth and enhance the company's competitive position.
- **Innovation and Differentiation:** WG Curacao B.V. should prioritize innovation to differentiate its products and services from competitors. This can involve developing proprietary technologies, incorporating cutting-edge features, and staying ahead of industry trends to provide unique value propositions to clients.
- **Regulatory Compliance:** Continued focus on regulatory compliance is crucial for long-term success in the online gambling industry. The company should stay informed about changes in regulations, ensure adherence to licensing requirements, and implement robust compliance processes to mitigate risks and build trust with clients and regulatory authorities.
- **Customer Experience Enhancement:** Improving the overall customer experience is essential for retaining existing clients and attracting new ones. This can include investing in user-friendly interfaces, providing responsive customer support, and offering personalized gaming experiences tailored to individual preferences.
- **Geographic Expansion:** Beyond the initial target markets, WG Curacao B.V. should explore opportunities for geographic expansion into new regions with growing demand for online gambling services. Conducting thorough market research and understanding local regulations and consumer behaviors are crucial steps in entering new markets successfully.
- **Talent Acquisition and Development:** Building a talented and dedicated team is essential for executing growth strategies effectively. The company should invest in recruiting top talent with expertise in software development, gaming regulations, marketing, and other relevant areas. Additionally, providing ongoing training and development opportunities can help retain employees and foster a culture of innovation and excellence.

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SWOT Analysis

Strengths:

- **Proprietary Intellectual Property:** The company possesses unique technologies, designs, and content that differentiate it from competitors, providing a competitive edge in the market.
- **Experienced Leadership:** Owner Trevor De Giorgio brings extensive experience in legal, compliance, and regulatory affairs within the gaming industry, providing strong leadership and industry expertise.
- **Comprehensive Suite of Services:** WG Curacao B.V. offers a comprehensive suite of online gaming services, including online casinos, with plans for expansion into live casino offerings, catering to a wide range of client needs.
- **Regulatory Compliance:** The company's focus on regulatory compliance and pursuit of licensing from the Curacao Gaming Control Board demonstrates a commitment to operating within legal frameworks, enhancing trust and credibility.

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Weaknesses:

- **Limited Geographic Presence:** The company's current focus on a few target markets may limit its growth potential, especially considering the rapidly expanding global online gaming market.
- **Dependency on Licensing:** The company's operations are dependent on obtaining licenses from regulatory authorities, and delays or challenges in obtaining these licenses could hinder growth and expansion plans.
- **Competitive Market:** The online gaming industry is highly competitive, with numerous established players and new entrants constantly emerging, posing a challenge to market penetration and differentiation.
- **Talent Acquisition and Retention:** Recruiting and retaining top talent in areas such as software development, regulatory compliance, and marketing may be challenging, particularly in a competitive

industry landscape.

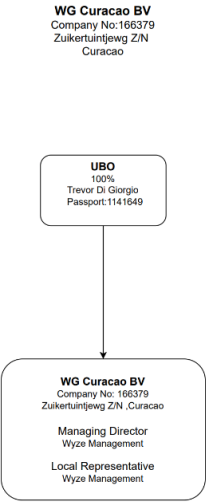
Opportunities:

- **Market Expansion:** Opportunities exist to expand into new geographic markets with growing demand for online gaming services, leveraging the company's expertise and innovative solutions.
- **Diversification of Products and Services:** Diversifying product offerings to include additional gaming verticals such as sports betting or lottery platforms can open up new revenue streams and attract a broader client base.
- **Strategic Partnerships:** Forming strategic partnerships with other companies in the gaming industry can provide access to new technologies, markets, and resources, accelerating growth and market penetration.
- **Technological Advancements:** Embracing technological advancements such as virtual reality (VR) gaming or blockchain-based solutions can enhance the company's offerings and differentiate it from competitors.

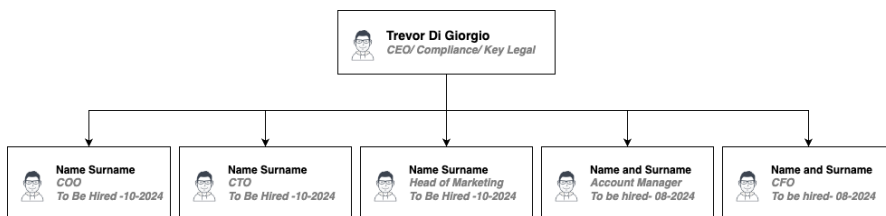
Threats:

- **Regulatory Risks:** Changes in gaming regulations or failure to comply with licensing requirements could result in fines, penalties, or even loss of operating licenses, posing a significant threat to the company's operations.
- **Cybersecurity Risks:** The online gaming industry is susceptible to cybersecurity threats such as data breaches and hacking attacks, which could compromise customer data and damage the company's reputation.
- **Economic Instability:** Economic downturns or instability in key markets could lead to a decrease in consumer spending on online gaming, impacting the company's revenue and growth prospects.
- **Legal Challenges:** Legal challenges from competitors, regulatory authorities, or other stakeholders could disrupt operations and result in costly legal proceedings, posing a threat to the company's financial stability and reputation.

Company shareholding structure



Company organization structure



CEO / Compliance / Legal – Trevor De Giorgio

Trevor De Giorgio is a highly experienced professional with a distinguished career in legal, compliance, and regulatory affairs within the gaming industry. With a robust background spanning over a decade, Trevor has demonstrated leadership and expertise in navigating complex legal landscapes, ensuring regulatory compliance, and driving strategic initiatives for notable companies in the gaming sector.

Responsible for:

- Ensure compliance with all relevant laws, regulations, and industry standards.
- Coordinate internal and external audits to assess compliance effectiveness.
- Develop and update compliance policies in response to regulatory changes.
- Establish mechanisms for ongoing monitoring of compliance.
- Conduct due diligence on third parties to ensure compliance.
- Promote a culture of compliance within the organization.
- Develop and execute the company's strategic plan.
- Provide strong leadership to the executive team and employees.
- Ensure compliance with corporate governance principles.
- Oversee budgeting, financial reporting, and capital allocation.
- Explore new business opportunities and partnerships.
- Foster a positive organizational culture.
- Communicate effectively with internal and external stakeholders.
- Encourage innovation and continuous improvement.
- Draft, review, and negotiate contracts and agreements.
- Manage legal disputes and legal proceedings, monitor changes in laws and advise on compliance.
- Protect intellectual property rights.

Future Positions (To be Hired as Needed):

COO:

- Job Description: Oversees day-to-day operational activities, optimizing processes, and ensuring efficiency.

Head of Marketing:

- Job Description: Leads marketing strategies, brand development, and customer acquisition efforts. Promotes the company's products and maintains market presence.

Account Manager:

- Job Description: Manages customer relationships, addresses client inquiries, and ensures a positive customer experience.

CTO:

- Job Description: A senior executive responsible for overseeing the technology strategy, development, and implementation within an organization.

CFO:

- Job Description: The CFO plays a critical role in financial planning, budgeting, forecasting, reporting, and analysis to support the company's strategic objectives and drive sustainable growth.

Games Development and Risk Evaluation Process

The risk evaluation process is conducted internally within WG CURACAO B.V. However, the risk evaluation and management services themselves are outsourced to a third party, demonstrating a commitment to utilizing external expertise in assessing and mitigating risks.

WG CURACAO B.V. places significant emphasis on effective risk management, employing a robust Risk Management Model as outlined in its specialized Risk Management Policy document. Primary responsibility for overseeing and approving changes to this policy lies with the Board of Directors and C-level Management, who are critical stakeholders in the process. The Chief Executive Officer holds the authority to authorize adjustments to operating procedures, standards, guidelines, and technologies within the framework of the policy.

The Board of Directors is empowered to approve the policy and conducts annual reviews to ensure its ongoing relevance and effectiveness. C-level Management is responsible for successfully implementing and administering the policy's directives. Additionally, the Chief Executive Officer, along with all employees, bears core responsibility for upholding the policy and its operating procedures.

Importantly, the policy and its procedures fully comply with all applicable legal and regulatory requirements imposed on WG CURACAO B.V., ensuring that they do not supersede or contradict any such obligations.

WG CURACAO B.V. actively promotes open communication, transparency, and active engagement from all key stakeholders in its model risk governance, particularly in the B2B context. This includes fostering an environment that encourages 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 collaboratively work to create a conducive atmosphere for these constructive challenges.

Change management processes are integral to model governance, especially when implementing or modifying models and related technologies. These processes comprehensively cover various domains, such as model development, personnel, policies, testing and validation, IT systems, regulatory requirements, and internal controls. WG CURACAO B.V. may engage third-party experts with specialized technological knowledge to ensure effective management of third-party risks.

To ensure proper oversight of model risk management, detailed meeting minutes are documented by the Board of Directors. These minutes provide meticulous records, substantiating that the Board of Directors and Chief Compliance Officer are fully informed about relevant facts, comprehend associated risks, deliberate on significant matters, make independent decisions in WG CURACAO B.V.'s best interests, and approve previously held meeting minutes. This rigorous approach ensures accountability and transparency in WG CURACAO B.V.'s model risk management practices within the B2B sphere.

Legal and governance framework

- **B2B Regulatory Compliance:** WG CURACAO B.V. prioritizes adherence to all pertinent regulations and licensing requirements across its operational jurisdictions. This entails meticulous verification of licenses, certifications, and alignment with responsible gaming standards to ensure regulatory compliance.
- **Security Protocols:** Rigorous evaluation of the provider's security measures is conducted to fortify defenses against fraud, cheating, and data breaches. This encompasses thorough assessments of encryption techniques, secure payment processing systems, and robust safeguards against hacking attempts.
- **Game Integrity and Fairness:** Stringent scrutiny is applied to assess the fairness and randomness of games provided. This entails in-depth examination of software algorithms, random number generators (RNGs), and independent audits to guarantee that game outcomes remain genuinely random and free from manipulation.

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- **Quality Assurance:** Comprehensive evaluations are performed to gauge the overall quality of games, encompassing aspects such as graphics, audio, gameplay mechanics, and user experience. Rigorous testing ensures the identification and resolution of bugs, glitches, and compatibility issues across diverse devices and platforms.
- **Responsible Gaming Compliance:** WG CURACAO B.V. ensures that its providers uphold responsible gaming practices by offering tools for self-exclusion, implementing deposit limits, and providing resources for addressing problem gambling.
- **Supplier Reliability and Reputation:** The stability and reputation of game providers are meticulously evaluated, considering factors such as track record, customer feedback, and any past incidents or controversies associated with their offerings.
- **Customer Support Excellence:** The efficiency and effectiveness of the provider's customer support infrastructure and complaint resolution procedures are evaluated, emphasizing responsiveness, professionalism, and timely issue resolution.
- **Continuous Oversight:** Mechanisms for ongoing monitoring and review are implemented to ensure sustained compliance with standards and regulations, including periodic audits, updates, and evaluations.
- **The governance framework** guiding decisions related to the Risk Management Policy and Model at WG CURACAO B.V. vests exclusively with the esteemed Board of Directors and C-level management. This structure ensures clear demarcation between strategic determinations and operational matters, with day-to-day execution falling under the purview of the C-level management, in accordance with endorsed policies like KYC, AML, and Compliance.
- To mitigate potential deadlock situations, the CEO holds the decisive vote in the event of tie among the four C-level management members, facilitating prompt decision-making.
- Transparent communication channels are established between the Board of Directors and C-level management, fostering a seamless exchange of information during quarterly board meetings, ensuring informed decision-making and effective oversight.
- Legal counsel plays a crucial role in WG CURACAO B.V.'s decision-making processes, with the engagement of specialized corporate service providers and legal firms ensuring comprehensive legal guidance tailored to specific regulatory landscapes across various jurisdictions.
- These measures underscore WG CURACAO B.V.'s commitment to robust corporate governance, facilitating informed decision-making, effective oversight, and adherence to legal and regulatory standards, thus reinforcing its dedication to excellence in risk management and corporate governance.

Policies and Procedures

The implementation of comprehensive policies and procedures within an organization is paramount for ensuring operational efficiency, mitigating risks, and maintaining ethical standards. Each set of policies serves a specific purpose:

- **Information Security Policy:** Safeguards sensitive information through secure data handling, access controls, and risk management.
- **Advertising Policy:** Ensures brand consistency and ethical promotional practices, guiding the creation and dissemination of advertising materials.
- **System Access Control Procedure:** Regulates access to organizational systems, enhancing data security through authentication and authorization controls.
- **User Management Policy:** Establishes rules for secure and efficient user account management, contributing to overall data protection.

- **Human Resources Roles and Responsibilities:** Defines the functions and duties of HR personnel, ensuring clarity and efficiency in HR operations.
- **Disaster Recovery Plan:** Ensures business continuity by outlining procedures for data recovery, system restoration, and operational continuity during disruptive incidents.
- **Financial Accounting Procedures:** Guides the systematic recording and reporting of financial transactions, ensuring accuracy, transparency, and compliance with accounting standards.
- **Backup Procedure:** Establishes a systematic approach to creating and maintaining backups, mitigating the impact of data loss incidents.
- **Change Management Procedure:** Governs the introduction of modifications, minimizing risks and ensuring seamless transitions during changes in IT systems or organizational structure.

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if yes, please advise if IGA will have opportunity to draft them?

Internal vs. External Development:

- **Implementation Approach:** Information Security Policy, Advertising Policy, System Access Control Procedure, and User Management Policy are developed internally.
- **Rationale:** In conclusion, the decision to internally develop the Information Security Policy, Advertising Policy, System Access Control Procedure, and User Management Policy is rooted in the organization's existing expertise, resource optimization, alignment with organizational needs, flexibility, and the prioritization of confidentiality and security. This approach ensures a strategic, customized, and controlled development process that resonates with the specific dynamics of our business.
- **Development Timelines:** Policies to be developed within 2 months, followed by internal review, legal review, GCB review, phased implementation, and full integration within 6 months.
- **GCB Appraisal:** Commitment to keeping the Gambling Control Board (GCB) informed through monthly progress updates, quarterly reviews, immediate integration of feedback, and timely responses to queries.
- **Reporting Mechanism:** Transparency and regulatory compliance ensured through monthly progress reports, quarterly implementation status reports, immediate notification of significant changes, and regular updates on minor adjustments.
- **Qualifications and Competency of Developers**
 - **Selection Criteria:** Clearly define criteria for selecting developers responsible for each policy and procedure.
 - **Expertise Assessment:** Outline specific qualifications, expertise, and experience required for developers.
 - **Conflict of Interest Assurance:** Provide assurance of developers' qualifications, competence, and absence of conflicts of interest.
 - **Due Diligence:** Describe the due diligence process undertaken to assess developers' qualifications and competence.
 - **Ongoing Monitoring:** Explain mechanisms for ongoing monitoring to ensure continued qualification, competence, and absence of conflicts.

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