

WG Curacao B.V.

Business Plan

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Executive summary

WG Curacao B.V. showcases proprietary intellectual property on their website (bingox.io). 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 Curaçao, specializing in delivering advanced software solutions to licensed online gaming operators. Under the leadership of owner Xiaochang Zou, a highly experienced professional with a distinguished career in legal, compliance, and regulatory affairs within the gaming industry, the company is well-positioned to make significant strides in the online gaming sector.

WG Curacao B.V. is applying for a new B2C license under the recently released regulations of the Curaçao Gaming Authority (CGA).

WG Curacao B.V. offers a comprehensive suite of online gaming services, including online casino games, sports betting, and live studio operations. The company targets Asia and Europe as its primary markets, aiming to establish a strong presence and meet the growing demand for high-quality online gaming entertainment in these regions.

Vision and Mission

Vision:

To be a leading provider of innovative and compliant software solutions in the online gaming industry, empowering licensed operators across global markets to deliver exceptional gaming experiences. We aspire to shape the future of online entertainment by setting the standard for legal, secure, and user-centric gaming platforms.

Mission:

Our mission is to provide cutting-edge, reliable, and fully compliant online gaming solutions that meet the evolving needs of operators in South Korea, Europe, and beyond. By leveraging our expertise in legal, compliance, and regulatory affairs, we aim to support the growth of our partners with a robust suite of services, including online casinos, sports betting, and live studio operations. We are dedicated to fostering a secure, responsible, and entertaining environment for players while maintaining the highest standards of industry excellence.

Why We Are Applying for the CGA License:

As the online gaming industry continues to evolve, particularly with the release of new regulations by the Curaçao Gaming Authority (CGA), obtaining a CGA license is crucial for ensuring that WG Curacao B.V. remains at the forefront of regulatory compliance and industry best practices. The CGA's updated licensing framework is designed to provide greater clarity and more stringent regulatory oversight, which aligns with our commitment to offering secure, compliant, and responsible gaming solutions.

By applying for a CGA license, we demonstrate our dedication to operating with the highest standards of integrity, security, and compliance. The CGA license will also enhance our credibility with both players and potential business partners, ensuring that WG Curacao B.V. is recognized as a trusted provider in the global online gaming industry.

Our decision to apply for this license reflects our strategic vision of becoming a leading software provider for licensed operators in regulated markets, and we believe that the CGA's updated regulatory framework will allow us to expand our services to a broader range of markets with the assurance that we are operating within fully compliant and transparent guidelines.

Affiliate Marketing

- **Affiliate Programs:** Create a robust affiliate marketing program to attract gaming influencers, content creators, and websites that can promote your platform. Affiliates will drive traffic and players to your site in exchange for a commission on player activity or deposits. Tailor commission structures based on your business model, such as revenue share, cost per acquisition (CPA), or hybrid models.
- **Partnerships with Influencers & Content Creators:** Collaborate with influencers, streamers, and bloggers in the online gaming community. Use platforms like Twitch, YouTube, or Instagram to promote your platform through game playthroughs, reviews, or live sessions. Influencers can engage their followers by sharing their experience with your games, boosting visibility and credibility.
- **Referral Programs:** Offer players an incentive to refer friends to your platform. For example, provide both the referrer and the referred with a bonus or free spins after the new player registers and makes their first deposit. This can help grow your user base quickly and efficiently.
- **Affiliate Tracking Tools:** Implement a solid affiliate tracking system to monitor the performance of your affiliates. This system will help you optimize campaigns, track conversions, and ensure affiliates are rewarded accurately.

SWOT Analysis

Strengths:

- Under the leadership of Xiaochang Zou, who has deep expertise in legal, compliance, and regulatory affairs in the gaming industry, WG Curacao B.V. benefits from strong guidance and industry insights.
- Curacao has a longstanding reputation as a trusted jurisdiction for online gaming businesses, offering a well-regulated, business-friendly environment. This association can lend credibility to WG Curacao B.V.
- The company offers a wide range of online gaming services, including online casinos, sports betting, and live studio solutions, which cater to the evolving demands of the global gaming market.
- Strong focus on ensuring compliance with international gaming regulations, especially in Europe and South Korea, which builds trust with clients and end-users.
- The company has identified key target markets in South Korea and Europe, providing a diverse revenue stream and the opportunity for international expansion.

Weaknesses:

- Entering new markets, especially South Korea, presents a challenge due to local regulatory requirements and cultural differences that might take time to navigate effectively.
- The company's success is heavily dependent on obtaining regulatory approvals and licensing (e.g., CGA), which can be time-consuming and subject to changes in the legal landscape.
- As a startup, WG Curacao B.V. may face challenges in building brand recognition, especially when competing with established industry players with more marketing resources and customer trust.
- Developing and maintaining advanced, scalable software solutions can be resource-intensive, requiring continuous investment in R&D and talent acquisition.

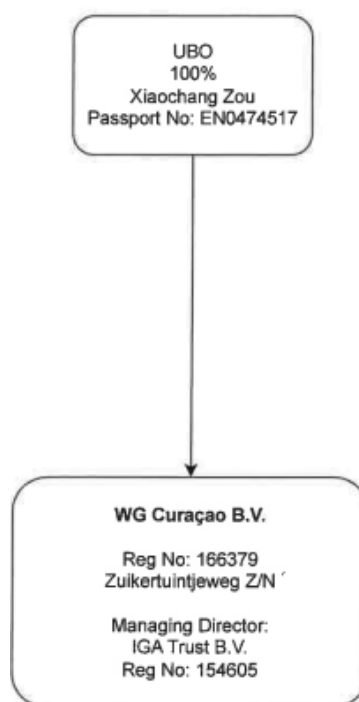
Opportunities:

- The gaming industry in South Korea and Europe is growing, with increasing demand for regulated online gaming platforms. WG Curacao B.V. can capitalize on this by offering tailored solutions for these regions.
- With the updated regulations from the Curacao Gaming Authority (CGA), obtaining a CGA license can enhance the company's credibility, allowing it to operate in more jurisdictions and attract more clients.
- There is potential for partnerships with other online gaming operators, affiliates, influencers, and content creators. This could significantly boost visibility and customer acquisition.
- The opportunity to innovate with emerging technologies, such as AI, VR/AR for immersive gaming experiences, and blockchain for enhanced transparency and security, could set WG Curacao B.V. apart in the competitive gaming industry.
- With the increasing popularity of sports betting, especially in regions like Europe, WG Curacao B.V. can expand its offerings and tap into this growing market.

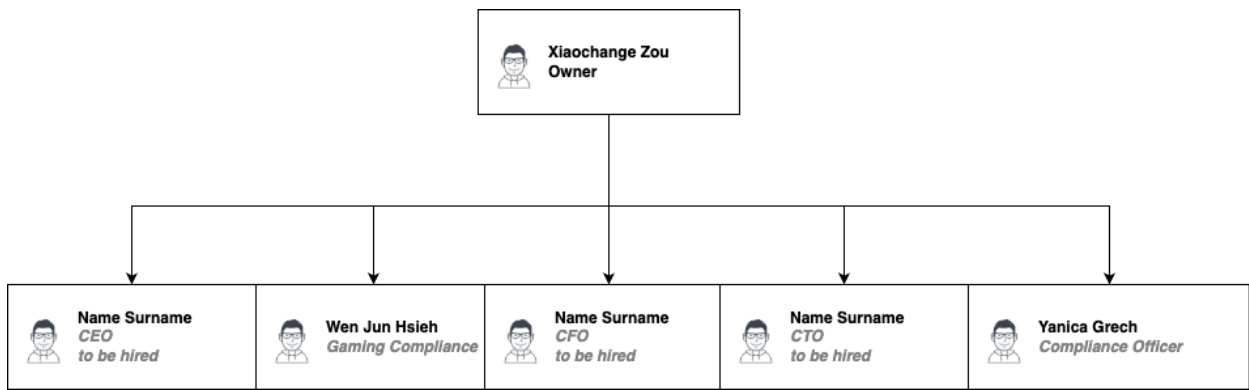
Threats:

- The online gaming sector is highly competitive, with established players dominating the market. WG Curacao B.V. faces the challenge of differentiating itself and gaining market share.
- The online gaming industry is heavily regulated, and frequent changes in local and international laws can pose a threat. Sudden changes could affect WG Curacao B.V.'s operations, especially if new regulations are more stringent. Economic instability in target markets (such as South Korea and Europe) can reduce disposable income, leading to lower player activity and engagement, which could impact revenue.
- The online gaming industry is a target for cyberattacks. Data breaches or security flaws in gaming platforms could undermine customer trust and result in significant financial and reputational damage.
- The online gaming market in certain regions, like Europe, is becoming saturated with many platforms offering similar products. Standing out among competitors will require continuous innovation, effective marketing, and customer loyalty programs.

Company shareholding structure



Company organization structure



Owner : XiaoChange Zou

Adept at transforming business strategies into success, the owner spearheaded operations at BINGO IMAGINATION PTY LTD, driving the development of a leading online crypto casino. His expertise in project management and strategic financial planning, coupled with a knack for risk management, has consistently enhanced portfolio performance, showcasing a unique blend of analytical and leadership skills.

Gaming Compliance: Wen Jun Hsieh

Wen Jun Hsieh is a proactive and detail-oriented professional with extensive experience in compliance, specializing in the iGaming sector. With a proven track record of assisting numerous clients in the iGaming industry to obtain gaming licenses, particularly in jurisdictions such as Malta, Curacao, UK, Romania, and Canada, Wen Jun brings a wealth of expertise in navigating complex regulatory landscapes.

Throughout her career, Wen Jun has demonstrated strong organizational skills and a keen ability to manage multiple projects simultaneously, ensuring timely and efficient completion while exceeding client expectations. Her proactive approach and meticulous attention to detail have made her instrumental in overseeing and managing compliance projects from inception to completion.

One of Wen Jun's key strengths lies in his effective coordination and management of projects, where she actively engages with clients, regulatory authorities, and internal stakeholders to ensure that all project requirements are met with precision and professionalism. her dedication to delivering results that exceed expectations and forge lasting partnerships built on trust and integrity underscores his commitment to excellence and client satisfaction.

In addition to her hands-on experience, Wen Jun continually seeks to enhance her knowledge and skills through ongoing education and training. His passion for excellence drives her to stay abreast of the latest developments in compliance regulations and best practices, enabling her to provide informed guidance and support to the company.

With her expertise, dedication, and proven track record, Wen Jun Hsieh is a valuable asset to any organization, poised to uphold the highest standards of compliance and contribute to the success and growth of the company.

AML Compliance: Yanica Grech

Yanica Grech brings extensive experience in compliance and regulatory affairs within the remote gaming industry, particularly in online casinos, social casinos, and sweepstakes casinos. Currently serving as Senior Manager of Compliance at Momentum Corporate Services FZ LLC, Yanica has a strong track record in developing and implementing company policies, compliance programs, and managing licensing applications.

Her previous role as Head of Compliance at RedAcre LIMITED (now under Funderpro Ltd) further honed her expertise in regulatory matters, both within the US and Curaçao jurisdictions. Yanica's ability to navigate complex regulatory landscapes and ensure adherence to evolving compliance standards will be pivotal in her role as the MLRO for our business, overseeing all Anti-Money Laundering (AML) functions and ensuring the highest standards of financial integrity.

Her comprehensive knowledge of compliance regulations, her experience in licensing and regulatory audits, and her proactive approach to staying ahead of industry changes make her an invaluable addition to our team.

Future Positions (To be Hired as Needed):

CEO:

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

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

CGA Licensing: WG Curacao B.V. is applying for the **Curacao Gaming Authority (CGA)** license, ensuring adherence to its regulations. This includes demonstrating financial solvency, a clean track record of compliance, and adherence to gaming laws.

Anti-Money Laundering (AML) Compliance:

- Develop a comprehensive AML policy that ensures proper due diligence for all customers, including verification of identities (KYC), transaction monitoring, and reporting suspicious activities to relevant authorities.
- Know Your Customer (KYC):
Ensure that all players go through the KYC process before being allowed to engage in any financial transactions (deposit or withdrawal) to minimize fraud and meet regulatory standards.

Policies and Procedures

1. KYC (Know Your Customer) Policy

Key Procedures:

- Verification: Players must submit government ID, proof of address, and payment method details.
- Ongoing Monitoring: Regular checks on player activity and KYC status.
- Refused Verification: Accounts without proper KYC documents will be restricted.
- Suspension: Accounts may be suspended until KYC is completed, with funds held per policy.

2. Responsible Gaming Policy

Key Procedures:

- Self-Exclusion: Players can exclude themselves temporarily or permanently.
- Limits: Players can set deposit and time limits.
- Awareness: Provide educational resources and links to support services.
- Underage Prevention: Strict age verification to prevent underage gambling.

3. AML (Anti-Money Laundering) Policy

Key Procedures:

- Risk Assessment: Conduct regular AML risk assessments.
- Transaction Monitoring: Monitor for suspicious transactions and report to authorities.
- Player Identification: Verify the source of funds for high-value transactions.

4. Suspension and Closure of Player Accounts Policy

- Suspension: Accounts may be suspended for non-compliance (e.g., failure to provide KYC).
- Closure: Accounts may be permanently closed for policy violations or suspicious activity.
- Player Funds: Funds will be returned per the company's terms if an account is closed.

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, CGA review, phased implementation, and full integration within 6 months.
- **CGA Appraisal:** Commitment to keeping the Gambling Control Board (CGA) 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.