
Business Plan

Bellona N.V.

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BUSINESS OBJECTIVE

Bellona N.V. is an online gaming company committed to providing high-quality gaming experiences to its users. The company's operations are licensed and regulated by Antillephone N.V, under License No 8048/JAZ2010-010.

Bellona makes it a priority to understand the needs of every customer by controlling and operating technical and customer support staff, to provide better service and build a true, honest, and reliable relationship with clients and partners through cutting-edge technologies and a user-friendly platform.

The priorities are:

- Creating the most favorable and user-oriented conditions in comparison to other betting companies;
- Providing high quality of service.
- Providing high quality support to its clients.
- Providing the newest and most desirable games on the market.

Over the last few years, Bellona has consolidated a wide portfolio of successful websites for online casino games and sports betting where the client can play and/or place bets on any kind of events.

SERVICES

The core products offered by Bellona are:

Casino

- Slots
- Live Casino

Sports Betting

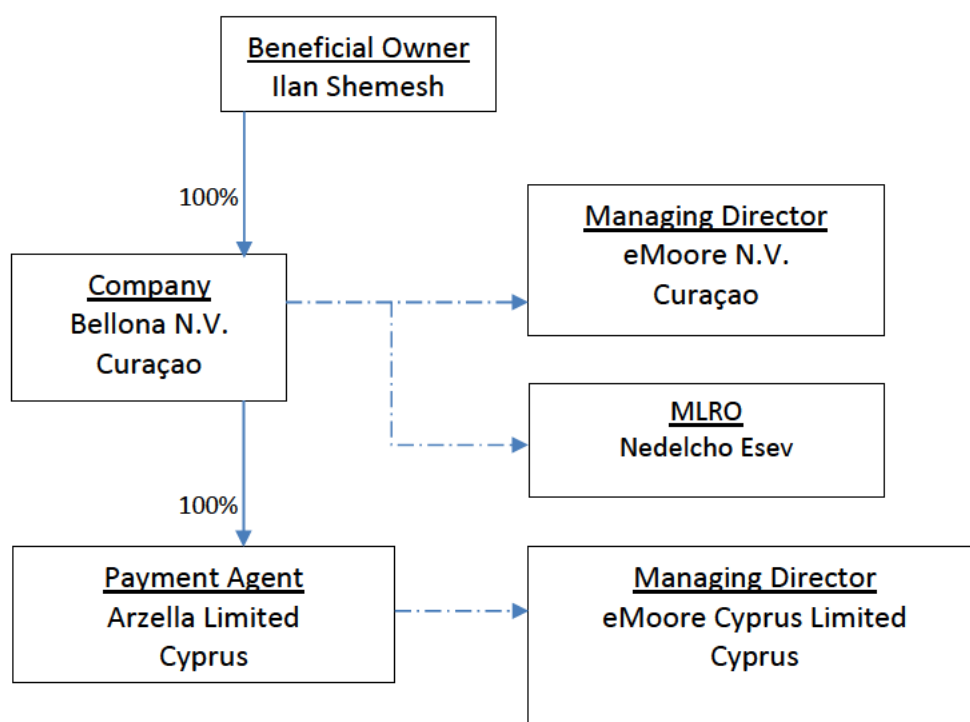
- Diversity of sports sectors
- Diversity of bet opportunities
- Wide market variety

CORPORATE STRUCTURE, DIRECTORS AND SHAREHOLDERS

The ultimate beneficial owner of Bellona N.V. is Mr. Ilan Shemesh, who has 100% ownership interest in the company.

The corporate governance of the company is handled by eMoore N.V., which acts as the appointed Managing Director of Bellona. The appointed MLRO of the company is Mr. Nedelcho Esev.

The company has an established subsidiary EU-based entity (Arzella Limited) to facilitate collaboration with certain suppliers and partners.



FINANCIAL

We have prepared a forecast based on previous performance, ongoing market research and internal projections. The below overview shows the development for the next 3 years.

<i>EUR'000</i>	Year 1	Year 2	Year 3
Total Revenue	5289	5687	6218
Total Expenses	5162	5522	5974
Net Profit	127	165	244

COMMERCIAL AND GROWTH STRATEGY

MARKETING PLAN

The significant increase in interest in everything 'online' and the expansion of the gaming industry in recent years invokes a necessity for any successful online business to have a competent marketing strategy with the emphasis on strategic internet outreach. Instruments such as SEO Services and Affiliate Marketing Services to help to attract the target audience have proven to be invaluable in the past. Technological improvements and increased interconnectedness only augment their potential, which is why they remain key drivers of growth.

PROBLEM WORTH SOLVING

The notable margin within the online betting industry indicates an opportunity for an expanded array of services in this sector. Currently, there are no prominent regional operators that stand out as leaders; however, some of the largest and most recognized platforms and markets are concentrated in Europe.

OUR SOLUTION

Some markets have access, stability, financial, regulatory or other issues and restrictions, which make them non-viable. We make use of IP and geolocation blocking for such undesired or sanctioned jurisdictions such as the Dutch Caribbean, The Netherlands, United States, France, North Korea, Syria, Israel and Iran and more. Further, in the long run we plan to develop and implement additional security and restriction protocols.

OUR ADVANTAGES

Our team has extensive experience in gaming and sports betting activities, which gives us the capability to offer a product that serves an engaging user experience. We are well versed in AML/KYC regulation and have abundant knowledge in key drivers for customer activity and engagement.

GENERAL CONTROLS & DUTIES

Bellona N.V. has separate departments for development, legal, finance, casino management, customer support, payments, fraud & risk, business intelligence and marketing, complementary set-up to our service providers. This is the first control in place. Individuals have clearly defined roles and responsibilities, including reporting lines within the company. As a result, each department has both substance and clarity to enable its goals and objectives.

Bellona imposes restrictions and fully complies with the accepted legal age of 18+ being the players allowed to use online commercial gaming products.

The risk and compliance departments are responsible for monitoring all transactions to and from Bellona and verifying the identity of all registered users. Bellona's employees are fully committed to adopting a risk-based approach to anti-money laundering (AML) with effort focused where it is most needed to be able to process payment transactions between the company and its customers in a way that is both seamless and protected against money laundering pitfalls. An AML manual outlining the policy and procedures in relation to risk assessment and management has been prepared for this purpose.

The developed internal systems and procedures applied by Bellona are appropriate for remote gaming businesses. The Company appreciates that its money laundering and terrorist financing risk assessment is not a one-off exercise, and these are reviewed and updated regularly so that adopted approach is effective at any time. To the same end, all employees, even including the UBO receive regular AML training & assessment, ensuring compliance and security across the board.

The governance framework of the company is set-up in a way, which excludes the possibility of decision-making deadlocks. Core oversight matters are decided by the board along with the UBO and relevant stakeholders, who provide strategic direction and a clear scope of authority delegation, which is coordinated with expert legal guidance, both internal and external, on contractual matters and regulatory compliance among other topics. This structure ensures efficiency, continuity, coherence, and the minimisation of legal obstacles in the decision-making process.

TECHNOLOGY, SOFTWARE & PROVIDERS

SOFTWARE AND PAYMENT ARCHITECTURE

The games/services that will be provided are Sports betting, slots & live casino. These are provided through platform/software services providers, such as GlobalTech Markets EOOD and Ardevar Limited.

To stay competitive in this fast-growing space and to reach end users who prefer using a variety of channels such as cards, e-wallets and so on as a means of payment, we have chosen to adopt on-line payments methods (safe and secured), provided by a number of partners including: MiFinity, Skrill, Klarna, Jeton, ExFrame, WorldCard, Gigadat, Nuvei, MuchBetter and more.