

A crypto casino is an internet-based casino where digital coins are used to make transactions apart from or instead of fiat currencies.

Business Plan 2024-2027

Approved by

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Introduction

Online gambling market

The casino and online gambling industry is a multi-billion dollar industry. By the year 2021, the worldwide market for online gambling and betting had grown to a staggering \$61.5 billion. In 2028, this is expected to increase to 114.4 billion USD, a growth rate of just over 86%.

This rapid growth of cryptocurrencies has impacted online betting and created a crypto casino and gambling industry.



Driven by affordable smartphones, better broadband infrastructure, availability of cryptocurrencies and blockchain technology, the industry is set to grow to be worth about \$93 billion by 2024.

Crypto casino market size in 2021 was 10 billion US dollars, which is 64% more than the previous year.

Despite this rosy future of crypto casinos, they are plagued with challenges, including regulatory issues in countries that prohibit gambling, lack of clearly defined cryptocurrency laws, money laundering, volatility of cryptocurrencies, and gambling addiction, among others.

Definition of a crypto casino

A crypto casino is an internet-based casino where digital coins are used to make transactions apart from or instead of fiat currencies.

One key benefit of crypto casinos is the anonymity it affords users due to the security of using cryptocurrency.

In contrast, traditional payment options with debit cards and fiat currencies put users' identities at risk. The game changer for online casinos is the deployment of blockchain technology which promotes fairness, speed, and security of funds.

Blockchain technology runs on the principle of distributed ledger where blocks of data are stored, and this data becomes almost impossible to alter, thus preventing fraud and cheating.

A crypto casino is an internet-based casino where digital coins are used to make transactions apart from or instead of fiat currencies. Games, including baccarat, roulette, scraps, and sports betting, are all available on crypto casinos.

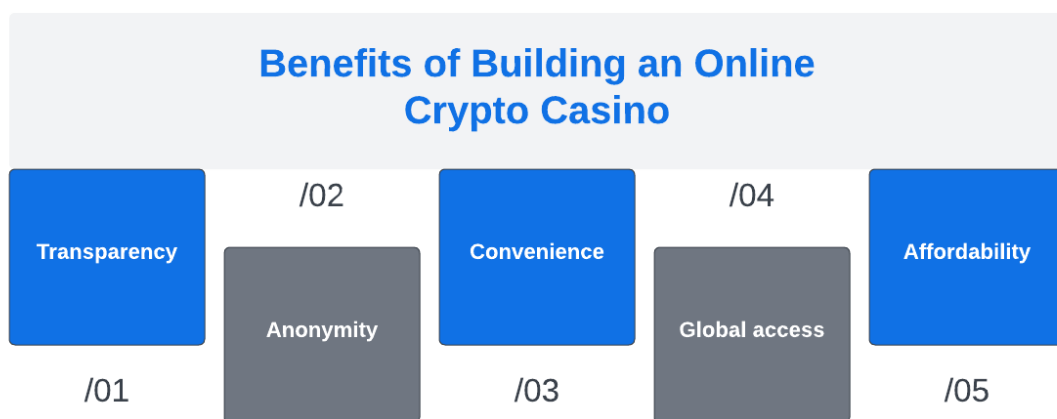
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Advantages of Building an Online Crypto Casino

Crypto casinos are increasingly popular among the online gambling community, and the reasons are not far-fetched. Here are some benefits of building an internet casino.



Transparency

One of the problems of operating a traditional casino is dealing with losses occasioned by fraudulent transactions by dishonest players. To prevent this, casinos usually spend a small fortune to keep these shady characters away.

On the other hand, crypto casinos use blockchain technology based on distributed ledgers viewable by the sender and receiver of cryptocurrencies to ensure transparency in transactions.

Anonymity

Not all gamblers want their identities known due to their social status or local laws and customs that frown on gambling. Crypto casinos afford these players the luxury of having their identities private.

Most cryptocurrencies use an address only and do not require any personal details of the crypto holder.

Convenience

With a smartphone and internet service, a player can easily access online casinos anywhere and anytime via the casino web app.

In addition, cryptocurrencies are available everywhere in the world at the same value every time. These two factors make online crypto casinos an easy option for gambling enthusiasts.

Global access

As with anything on the Internet, virtual gambling sites are open to everyone with internet access globally. Coupled with the availability of cryptocurrencies globally, virtual casinos have unlimited reach.

Online casinos have a diverse clientele from different countries who can simply play virtual games from anywhere, unlike traditional casinos that the local populace or tourists only patronize.

Low commissions

Top up a game account or withdrawing cryptocurrency costs from 0.01 to 5 USD (gas payment on the network), which is much lower than the bank commission.

Fast payouts

The transfer of cryptocurrency occurs almost instantly. While a regular bank transfer can take up to 3 days.

Affordability

Creating a crypto casino only requires a team of software developers to create the product, not hectares of land or physical roulette tables. Savings when creating an online casino allows you to use the savings to offer bonuses and promotions to attract more customers.

More to crypto casinos' affordability is the low transaction fees involved in depositing and withdrawing winnings, unlike fiat currencies which attract bank charges and conversion charges.

Purpose

Clients of betting companies and casinos often have their bank accounts blocked when replenishing their gaming account (such transactions are suspicious for banks). However, it is impossible to place large bets due to restrictions from local regulators. All gaming activity of the player is visible to the regulator and tax authorities. All this interferes with comfortable gambling.

The company plans to launch a crypto casino on the world market, including a bookmaker part (sports betting) and gambling (mini games, live dealer, slots). Cryptocurrencies will be the only means of replenishing a gaming account, placing bets and withdrawing funds, which will allow you to work all over the world. Players will be able to anonymously place bets with large limits not available on traditional betting platforms and casinos. In the future, the product will provide additional earning mechanics for players that are impossible or difficult to implement using standard tools (NFT, mining farms, own cryptocurrency, staking, etc.).

Although there were 304 crypto casinos at the end of 2021 and the number is constantly growing, only 30% of them processed cryptocurrencies exclusively. At the same time, the quality of the service provided, the range of games and lines at most crypto casinos is extremely low, the market is young.

The product being created must compete with the largest and most famous players in the crypto casino market: stake.com, bc.game, rollbit.com.

The company targets:

- market share by the end of 2027 – 5% of the crypto casino market in selected countries for promotion;
- casino customer retention – 6%;
- bookmaker customer retention – 8%;
- bookmaker GGR – 25% on average per year.

Target audiences and their preferences

The main target audience are players, clients of existing bookmaking companies and casinos who want anonymity, large limits, no problems with traditional financial instruments, as well as people who own cryptocurrency but do not use it to play in casinos and bets.

The product is aimed at large players (1 million USD drop), but also at players with small amounts.

Gender composition is 73% men and 27% women.

Age is from 18 to 80. Older players place fewer bets, but the amount of bets is higher (persons aged 41–50 years old bet 64.23% of all money, the number of bets is 26.34%, 31–40 years old bet 18.81%, the number of bets is 36.64%).

Important for everyone is simple registration, maximum possible anonymity, fast and reliable deposit/withdrawal of money from a gaming account, platform stability and performance, a wide range of games and bets, various bonuses and offers, convenient and clear UI/UX, fast and efficient support service, availability of client language and currency.

Priority countries

The countries for product release were selected based on the following criteria:

- Distribution and use of cryptocurrencies in the country.
- Spread of gambling addiction.

Additionally, it is necessary to consider the criteria that will be obtained based on regulatory restrictions:

- Development and absence of prohibitions for the gambling business on the part of the regulator.
- Absence of a country on sanctions lists.

Country	Gambling addiction	Gambling, billion USD	Online gambling, GGR billion US
Australia	- lost 958 USD per person - 75% of adults play - 18% of all slot machines in the world, poker is popular	18	6,55
Hong Kong	- lost 768 USD per person - is legal lottery, horse racing, football and hockey betting - no restrictions on online gambling		
Singapore	- lost 725 USD per person - 0.9% of the country's population are gambling addicts	6	
Finland	- lost 515 USD per person - popular lotto, slots and scratch cards - 78% of the population gambled at least once a year - 3% of the population are gambling addicts		

Country	Gambling addiction	Gambling, billion USD	Online gambling, GGR billion US
Greece	USD 2.3 billion was lost in 2021		1,3
Netherlands		3	
Spain		10	1,6
France	- 300 casinos in the country - horse racing and poker are popular	13	3,83
Germany	- 400 casinos in the country - Poker is popular	16	3,65
South Korea		11	
Philippines		5	
England		19	12,48
Italy	- Roulette is popular, football betting	20	4,51
Japan		50	6,7
Canada		14	2,55
Mexico		1,17	
Countries of Eastern Europe (Estonia, Finland, Norway, Switzerland, Sweden, Hungary)	About 3% of the population are gambling addicts. In Hungary - 7%		2.1 - Sweden
India	- 80% of the population played at least once a year - popular lotteries, sports betting, casinos		
African countries (Nigeria, Kenya, Uganda, Ghana)	- 40 million Nigerians place bets daily - 76% of Kenyans, 57% of Ugandans and 42% of Ghanaians gamble		

General Product Features

The product will include a bookmaker part (20%) and a casino part (80%).

The product will support desktop (for large players) and mobile version (for mass players). Thus, 77.16% of all bets are made through mobile devices (25.07% of total bets), and 22.64% of bets are made through desktop computers (74.85% of total bets).

Consider the geography of users, the site will support the following languages: English, German, Spanish, French, Hindi, Japanese, Korean, Indonesian, Polish, Portuguese, Turkish, Vietnamese, Chinese, Finnish, Arabic.

The product will be based on the current platform, which will consist of the following main parts.

Sports betting

The bookmaker part and most of the internal processes will be borrowed from the current platform.

Cryptocurrency will be used for sports betting. The winnings will also be paid out in the cryptocurrency in which the bet was placed.

Sports events will be represented by the most popular and economically attractive classical sports, country-specific sports, as well as e-sports.

The lines will also only be the main ones: outcome, total, handicap and several of the most popular ones for the relevant sports. It should be possible to quickly open new lines for players.

Players will see video and TLS.

Casino

Games in the casino will be presented in three types: mini games, live dealer, slots.

These games will be presented on the platform through direct integration or through aggregators. In any case, the integration will be carried out through an iframe technology and the impact on games will be minimal.

The list of games will be formed based on popularity, financial attractiveness, and characteristics of specific countries where the platform will be presented.

Fiat currencies will be used to display bets in games, since all providers support them, but not all cryptocurrencies. In this case, the debit from the balance will be carried out in cryptocurrency at the current conversion rate.

Games can be played in demo mode and for real money.

There will be provably fair games in which you can use cryptocurrency directly (plinko, limbo, keno, etc.) and the results of which can be verified. 77.6% of crypto casinos offer provably fair games.

The platform will have its own anti-fraud system, which will protect against bonus hunters, game hunters, opposite betting, and other methods of deception. Triggers will be configured for patterns of suspicious activity. Several levels of risk managers will decide whether fraud has occurred. Testers will also test games for errors.

A provider will be connected that provides a database of scammers.

Monetization

Every smart investor aims to make a profit from their investment. Monetization refers to the means or methods of generating revenue from a tech product. The company will have a well-developed crypto wallet to receive deposits and payout winnings in digital coins for a crypto casino.

The company will monetize crypto casino in the following ways:

- Transactions will be charged a commission. For example, a portion of deposits or winnings used to cover operating expenses.
- A virtual casino, like a traditional casino, makes money by offering games with a house edge. In terms of winnings, the casino is always ahead of the player. Casinos generate more revenue than winnings paid out to players using this monetization method.
- The company will make money is through advertisements placed by other brands on the casino's website. The casino earns money through commissions on each player who views advertisements and signs up through affiliate links.

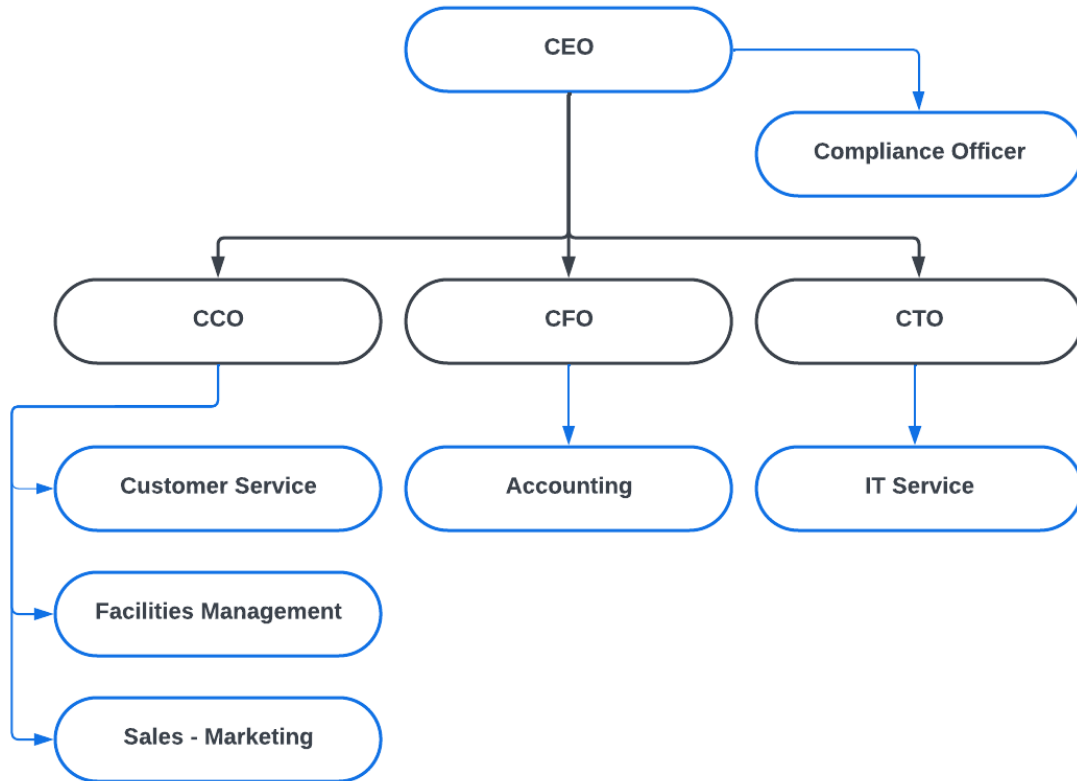
License

The company has a sublicense under License no 365/JAZ Sub-License GLH-OCCHKW0703092022 as of 13th day of January 2024 with their URL: <https://betone.com> from the jurisdiction of Curacao, which allows it to operate in many countries of the world, but at the same time has restrictions on the countries where services can be provided. The license will be used to open bank accounts and enter into agreements with game providers casinos and other partners.

In the future, additional licenses will be obtained to conclude marketing agreements and strengthen the presence of the product in the markets of some countries. Jurisdictions such as Cyprus, Serbia, Tajikistan, and Kyrgyzstan may be considered.

Organizational Plan and Personnel Summary

Corporate Organization



CEO:

- Increases management's effectiveness by recruiting, selecting, orienting, training, coaching, counseling, and disciplining managers; communicating values, strategies, and objectives; assigning accountabilities; planning, monitoring, and appraising job results; developing incentives; developing a climate for offering information and opinions; providing educational opportunities.
- Creates, communicates, and implements the organization's vision, mission, and overall direction – i.e. leading the development and implementation of the overall organization's strategy.
- Responsible for fixing prices and signing business deals.
- Responsible for providing direction for the business.
- Creates, communicates, and implements the organization's vision, mission, and overall direction – i.e. leading the development and implementation of the overall organization's strategy.
- Responsible for signing checks and documents on behalf of the company.
- Evaluates the success of the organization.

- Carries out staff induction for new team members.

CFO:

- Responsible for preparing financial reports, budgets, and financial statements for the organization.
- Provides managements with financial analyses, development budgets, and accounting reports; analyzes financial feasibility for the most complex proposed projects; conducts market research to forecast trends and business conditions.
- Responsible for financial forecasting and risks analysis.
- Performs cash management, general ledger accounting, and financial reporting for the organization.
- Responsible for developing and managing financial systems and policies.
- Responsible for administering payrolls.
- Ensures compliance with taxation legislation.
- Handles all financial transactions for the company
- Serves as internal auditor for the company.

Marketing and Sales Officer:

- Identifies, prioritizes, and reaches out to new clients, and business opportunities et al.
- Identifies development opportunities; follows up on development leads and contacts. participates in the structuring and financing of projects; assures the completion of projects.
- Writes winning proposal documents, negotiate fees and rates in line with organizations' policy.
- Responsible for handling business research, market surveys and feasibility studies for clients.
- Responsible for supervising implementation, advocate for the customer's needs, and communicate with clients.
- Develops, executes and evaluates new plans for expanding increase sales.
- Documents all customer contact and information.
- Represents the company in strategic meetings.
- Helps to increase sales and growth for the company.

CCO:

- Responsible for overseeing the smooth running of HR and administrative tasks for the organization
- Designs job descriptions with KPI to drive performance management for clients
- Regularly hold meetings with key stakeholders to review the effectiveness of HR Policies, Procedures and Processes

- Ensures operation of equipment by completing preventive maintenance requirements; calling for repairs.
- Defines job positions for recruitment and managing interviewing process
- Carries out staff induction for new team members
- Responsible for training, evaluation and assessment of employees
- Responsible for arranging travel, meetings and appointments
- Updates job knowledge by participating in educational opportunities; reading professional publications; maintaining personal networks; participating in professional organizations.

The Compliance Officer:

The Compliance Officer shall be responsible for the proper execution of the provisions in the Company's AML Policy and the necessary training of the Company personnel to be able to identify and report unusual transactions, which includes the following activities:

- to organize training sessions for the staff on various compliance-related issues;
- to review compliance with the Company's policy and procedures;
- to analyze transactions and verify whether any are deemed unusual under the NORUT and hence subject to reporting to the FIU;
- to review all internally reported unusual transactions for their completeness and accuracy with other sources;
- to keep records of internally and externally reported unusual transactions;
- to prepare the external report of unusual transactions;
- to execute closer investigation of unusual or suspicious transactions;
- to remain informed of the local and international developments on money laundering and terrorist financing and to make suggestions to management for improvements and;
- to prepare periodic information on the Company's efforts against money laundering and terrorist financing.

Organizational Budget

Numbers of Personnel plan

Employees	01.01.2024	01.01.2025	01.01.2026	01.12.2026
<i>CEO</i>	1	1	1	1
<i>Client manager</i>	1	2	3	3
<i>CFO</i>	1	1	1	1
<i>Marketing and Sales Officer</i>	0	1	1	1

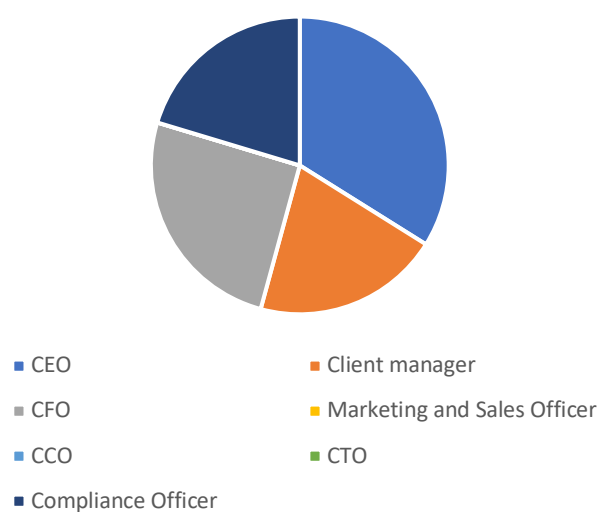
BUSINESS PLAN 2024-2027

Employees	01.01.2024	01.01.2025	01.01.2026	01.12.2026
<i>CCO</i>	0	1	1	1
<i>CTO</i>	0	1	1	1
Compliance Officer	1	1	1	1
<i>Total</i>	4	8	9	9

Personnel plan – Yearly

Employees	01.01.2024	01.01.2025	01.01.2026	01.12.2026
<i>CEO</i>	2000	2000	2000	2000
<i>Client manager</i>	1200	2400	3600	3600
<i>CFO</i>	1500	1500	1500	1500
<i>Marketing and Sales Officer</i>	0	1200	1200	1200
<i>CCO</i>	0	1200	1200	1200
<i>CTO</i>	0	1200	1200	1200
Compliance Officer	1200	1200	1200	1200
<i>Total</i>	5900	10700	11900	11900

Personal Expense Breakdown 2024





Management Biographies

Mr. Denis Olhovojs, the shareholder of the Company and the head of the project, under his strict leadership a new competitive product is born. Mr. Olhovojs was the manager of a variety of projects, which gave him invaluable experience and the ability to take a broad view of things. For example, he has experience in information technology and hotel business management. At different periods of his life, he held positions as Manager for the Development of Partnership Projects, Head of Research and Development, and Project Manager. Mr. Olhovojs has a master's degree in economics. Mr. Olhovojs is truly brilliantly capable of leading projects and monitoring the current activities of the organization, preparing, and coordinating documentation, organizing collaboration, and supervising internal and external teams. He skillfully attracts the necessary resources at the necessary stages for business development. Mr. Olhovojs, intends to unite true professionals in their field, for whom work were combined in a single common endeavor.

Mr. Serghei Barkov, the Compliance Officer of the Company and qualified lawyer, with solid background in banking and finance, strong leadership, and communicative skills. He certified by International Compliance Association. Moreover, he impeccably guards the AML/CFT legislation and is unerringly able to manage the entire compliance department thanks to the presence of Diploma in Clinical Psychology and Diploma in Profiling in his arsenal.

Selecting a Software Partner

Software constitutes a pivotal and multifaceted element within the online gambling sector. It serves as the cornerstone of online casinos and betting platforms, delivering players a seamless and secure gaming experience.

Choosing the right gambling software partner is of paramount importance. When making decisions, the main preferences were given to experience, reliability and ability to comply with regulatory requirements. Software providers have been pre-selected with an extensive and high-quality game portfolio, including popular games, custom lobbies, and live dealer options. In addition, a flexible API for quick integration plays a key role in the choice.

Special attention was also paid to the scalability and flexibility of the software, considering future growth and technological advances. The following parameters will be evaluated:

- Uptime,
- Average spin speed,
- Wallet transactions per second,
- Bets placed per minute,
- Settlement processing capabilities,
- Regulatory compliance,
- Services offered,
- Latency.

In addition, special attention was paid to the provider's track record of providing a safe and fair gaming experience, backed by certifications from reputable testing agencies such as GLI, ISO and others.

The Company considers BetGames one of the priority providers of gaming platforms. BetGames, a game provider, is a leading provider in the live dealer online gaming industry. It is a best gaming platform for casinos, live dealers and lotteries

BetGames allows the Company to increase the performance of your gaming platform by turning casual players into dedicated casino enthusiasts. With a curated portfolio of unique, fun and safe games, as well as targeted engagement features, BetGames enables partners to:

- Improve the player experience;
- Increase customer lifetime value (CLV) and retention rates;
- Increase profitability while reducing the cost of CPA and bonuses.

The main advantages of this platform, which will allow the Company to achieve the planned results, are given below:

- Innovative approach to 24/7 live dealer betting;
- Lower CPAs;
- Cross-selling between sports bettors and live casino players;
- Omni-channel solutions: online and retail available for multi-currency, including crypto;
- Graphical UI mode for varying bandwidth speeds;
- Over 250+ partners across numerous markets and jurisdictions.

BetGames is licenced and certified across numerous regulated markets, including UK, Malta, Latvia, Lithuania, Estonia, Italy, Bulgaria, South Africa and few more, and is also in the process of acquiring new licences in Greece and Ontario.

The Company also considers Evolution as a provider.

Working with more top-tier operators than any other provider in marketplace, Evolution leads the way in B2B online casino services delivered to its customers' players via multiple channels and devices. Through innovative software, well-established enterprise-class infrastructure and people, Evolution adds real value to its customers' gaming businesses.

Evolution offers operators an unrivalled portfolio of both time-honoured and unique casino games and live game shows that meet the needs of multiple international markets.

Created in 2006, the Evolution brand is the byword for world-leading, pioneering online Live Casino – and now, also, for a new generation of equally innovative and entertaining live game shows.

Evolution live offering is powered by 700-plus live tables/game show environments, operating in 15 languages around the clock from studios across Europe and North America, and delivering commercial success for operators and an unparalleled user experience for their customers.

To this Evolution has added yet another innovation: Evolution First Person RNG-based casino games and games shows. Offering a high-end, immersive virtual gaming experience, Evolution's First-Person games redefine RNG gaming and perfectly complement our live offering.

It works in partnership with its licensees in established gambling markets to deliver world-leading Online Casino Solutions designed to maximise every opportunity. In addition, Evolution constantly anticipates and prepares for new and re-regulating markets so that its licensees can win vital early market share.

To maximize business diversification and provide its customers with a greater variety of games, the company considers Pragmatic Play as a provider.

Pragmatic Play is a leading game developer providing player-favorites to the most successful global brands in the iGaming industry.

Powering up new possibilities of play through one single API, the company offers a multi-product portfolio of award-winning slots, live casino, bingo, virtual sports, sportsbook and more, available in all major regulated markets, languages and currencies.

The advantages of this company include:

- A lot of different kinds of games (Slots, Live Casino, Bingo, Virtual Sports, Sportsbetting & More;
- Certified and licensed in over 20 jurisdictions;

- Multi Award Winning Content;
- Mobile, desktop, 33 languages and all currencies.

Pragmatic Play is licensed and regulated by several industry governing bodies, and games are only released upon receiving their seal of approval.

Pragmatic Play also follows strict protocol to comply with responsible gaming law for all jurisdictions in which it operates or where its games are provided.

All Pragmatic Play games are integrated with player protection software as part of its license conditions. All games undergo periodic internal testing for quality assurance, and subsequently verified by an independent third-party.

To provide its customers with games in high-quality live broadcast mode, TVBET was chosen as a provider.

Live streaming is a fundamental characteristic of the content provided. Thanks to their technological superiority and exciting game mechanics, TVBET lotteries and card games have become an integral part of the portfolio of every bookmaker and casino.

The company has international recognition. Universal live games from TVBET are broadcast in 5 regions of the world: Europe, Africa, Latin America and Asia. Its products are featured in the gaming portfolio of more than 170 partners on 400+ websites worldwide.

The company's technologies have received various international awards:

- “Best Marketing Concept Program”, BEGE Awards 2019
- “Best Betting Product”, Login Casino Awards 2019
- “Best Developer of the Year”, Login Casino Awards 2019
- “Best Provider of Live Games”, Login Casino Awards 2020

8 TVBET products have successfully passed the certification of Gaming Labs International (GLI) - 1Bet, 5Bet, 7Bet, Lucky6, FruitRace, Battle of the Elements, JokerBet and WilBet.

This fact confirms the absolutely random nature of determining the results in the draws of live games from TVBET, which indicates 100% transparency of the results.

The company's management has extensive experience in creating and managing online casino businesses. This allows him to make the best decisions to successfully build a business.

The list of partners is given in the Appendix 1.

Addressing Security Challenges

One of the primary challenges contributing to financial losses for online casino operators is the persistent threat of fraud, bonus abuse, and security vulnerabilities. The iGaming industry continuously evolves alongside technological advancements, mirroring the escalating skills of scammers and hackers. Ensuring software provider adequately fortifies their platform and integrates AI-driven tools for bonus and fraud prevention is imperative.

To counter contemporary threats within the online casino sector, software provider should offer the following components:

- Jackpot hunting detection,
- Real-time bonus abuse detection,
- A smart personal player limitations system,
- AI-driven behavioral prediction patterns,
- Dynamic player segmentation,
- Anti-money laundering system,
- Real-time alerting.

The software should be simple, with user-friendly UI/UX ensuring a steep learning curve and smooth operations.

The software includes checks that allow staff to identify suspicious behavior in player accounts. For example: several unsuccessful authorizations in a row, password recovery and a request to withdraw all money from the game account.

Result of checks: manual analysis of the operation of withdrawing money from the gaming account, KYC request, restriction of access to the account.

Two-factor authentication by email will be enabled for all players by default; it cannot be disabled. Restoring access is only possible by contacting support.

Payment Processing

Secure and efficient payment processing is a cornerstone of any online gambling business, and its importance cannot be overstated. It directly impacts the trust and satisfaction of your players, regulatory compliance, and the overall success of your platform.

Expanding into new markets leans heavily upon securing the appropriate Payment Service Providers (PSPs). Opting for well-established PSPs allows players to gain gaming experience while avoiding potential payment-related complications.

When selecting a PSP, it is crucial to ascertain its availability in diverse markets to ensure a seamless transaction processing experience. Additionally, consider a range of payment methods, compliance with regulatory standards, transaction processing speed, and robust security measures.

Cryptocurrency wallet

Work with cryptocurrencies will be carried out on the basis of the Onchainpay cloud service, which, using the API, will create wallets for clients, make transfers, report on replenishment of wallets, and do KYT (via Chainalysis). The keys to client and system hot wallets will be on the Onchainpay side. The service charges commissions for its services. Services are provided by Broex UAB, a company registered and established under the laws of Lithuania. Broex UAB registration number is 305996131.

Broex UAB is powerful cryptocurrency payment gateway. It send and accept crypto payments with its all-in-one platform, ensuring secure transactions and comprehensive management for business

Personal permanent cryptocurrency wallets will be created for each player to replenish the game account. Each currency has its own crypto wallet, but for tokens on EVM (ERC20, BSC20, Polygon) compatible blockchains the wallet is the same. The following blockchains and tokens are supported initially for deposits and withdrawals:

Blockchain	BTC	ETH	USDT	USDC	DAI	BUSD	BNB	Matic
Bitcoin	+							
ERC20 (Ethereum)		+	+	+	+	+		
BSC20 (BNB)		+	+	+		+	+	
Polygon (Matic)			+	+	+			+
TRC20 (Tron)			+					

The balance of each token is taken into account separately, but is common for one token in different blockchains.

Conversion of tokens during withdrawal is not possible, i.e. It is impossible to withdraw them to ETH if you have USDT on your gaming account.

To understand his overall balance, the player will see the total balance for all cryptocurrencies in a pre-selected fiat currency, which he can change.

The wallet provides a search by currency, hiding zero balances, and sorting by balance.

Limits are set for each deposit and withdrawal. Replenishment is free for the client. When withdrawing, a fixed amount is taken to cover the network commission.

Curacao KYC, AML requirements will have to be met:

- Risk profiling of the client depending on the risk appetite of the business;
- AML monitoring of customer transactions;
- Anti-fraud monitoring of client transactions and actions on the platform;
- Ongoing monitoring;
- Scanning players against sanctions lists, PEP, OFAC and other watch lists;
- KYC checks as needed (via SumSub).

The list of partners is given in the Appendix 2.

Onboarding

Money Laundering is a process intended to mask the benefits derived from serious offenses or criminal conduct as described under the AML Law, so that they appear to have originated from a legitimate source. This includes all procedures to change, obscure or conceal the beneficial ownership or audit trail of illegally obtained money or valuables.

Money laundering is also used to hide the link between those who finance terrorism and those who commit terrorist acts. Financing of terrorism can be defined as the willful provision or collection, by any means, directly or indirectly, of funds with the intention that the funds should be used, or in the knowledge that they are to be used, to facilitate or carry out terrorist acts.

Involvement in money laundering, whether knowingly or unknowingly, may result in criminal liability and severe reputational damage to the Company and its Senior Management, officers and staff. The Company, therefore places the utmost importance on complying with all applicable laws and regulations for the prevention of money laundering and will use the procedures set out in this Manual to prevent its business from being abused for such criminal activities.

Casinos deal in financial transactions, often on a very large scale. Online gambling platforms and casinos can turn over millions of dollars a day, making them a prime target for money laundering and financial crimes. Not only that, the lack of face-to-face interaction on internet gambling platforms makes it easier for fraudulent users to play on these sites without detection.

KYC and identity verification processes are designed to help reduce the risks of illicit activity by identifying customers and verifying that this identity is correct. In doing this, suspicious characters and potentially high-risk users can be flagged and monitored or banned.

Without effective KYC policies, online casinos and gambling platforms are at risk of money laundering, various types of fraud, and sky-high non-compliance fines.

Access to the site is limited by IP addresses for prohibited countries. When a client registers, a nickname and avatar are automatically generated. If desired, the client can change them later.

After creating an account, the client can top up his wallet and play. To withdraw money, the client must provide the following data: first name, last name, date of birth, country of residence (filled in based on the IP address), residential address (city, zip code, address). This list of data is necessary to scan the client against sanctions lists. In case of suspicious activity or high-risk level of the client, biometric identification may be requested through third parties (for example, SumSub).

KYC parameters

Countries not classified as banned or highly monitored countries:

KYC level	Requirements
KYC is not carried out (one transaction within 45 days up to 1000 USD)	One deposit within 45 days up to 1000 USD (equivalent). If there is a second deposit for any amount within 45 days, then KYC is required ; One withdrawal within 45 days up to 1000 USD (equivalent). If there is a second withdrawal within 45 days (for any amount), then KYC is required ; The number of deposits and withdrawals within 45 days for the KYC criterion is not summed up.
First level KYC (two or more transactions for any amount within 45 days, or 1 transaction of 1000 USD or more)	Held standard KYC - ID loading (Passport, National identity card, Residence permit card , Driving license - on choice) and selfie liveness
Second level KYC (the amount of deposit transactions is more than 15,000 euros within 24 hours)	In addition to the standard KYC, one more document is requested to choose from the list: • bank statement • tax statement • bank reference letter • utility bill
Third level KYC (the amount of deposit transactions is more than 50,000 euros during the month)	Additionally, the source of origin of funds is requested (a document of your choice): • Sale purchase agreement • Tax Return (last two taxable years) • Letter from Bank/Accountant stating assets • Bank statement and/or equity statement • Paystub(s) showing previous two years income • An accountant's letter stating a client's real estate holdings and inheritance suffice for net worth

Countries with increased monitoring (KYC is always needed): Nigeria , Philippines , South Africa , Burkina Faso , Mali , Senegal , Tanzania , Uganda

KYC Level	Requirements
First level KYC (one deposit for any amount, the amount of deposit transactions within 24 hours is less than 15,000 euros)	Held standard KYC: - ID loading (Passport, National identity card, Residence permit card , Driving license - on choice); - selfie liveness .
Second level KYC (the amount of deposit transactions is more than 15,000 euros within 24 hours or the amount of deposit transactions is more than 25,000 euros within a month)	Additionally, the source of origin of funds is requested (a document of your choice): • Sale purchase agreement • Tax Return (last two taxable years) • Letter from Bank/Accountant stating assets • Bank statement and/or equity statement • Paystub(s) showing previous two years income • An accountant's letter stating a client's real estate holdings and inheritance suffice for net worth • Other ways to confirm the source of funds

Prohibited countries

KYC Level	Requirements
	No clients from these countries.

If the rules of the service are violated, the company transfers the account to a separate status and indicates the reason for closing the account. The account is closed permanently and cannot be reactivated. At the same time, IP addresses, wallets, email and player data are blacklisted so that this client can no longer register on the platform.

Marketing Plan

The company intends to maintain an extensive marketing campaign that will ensure maximum visibility for the business in its targeted market. Below is an overview of the marketing strategies and objectives of the Crypto Casino.

Marketing Objectives

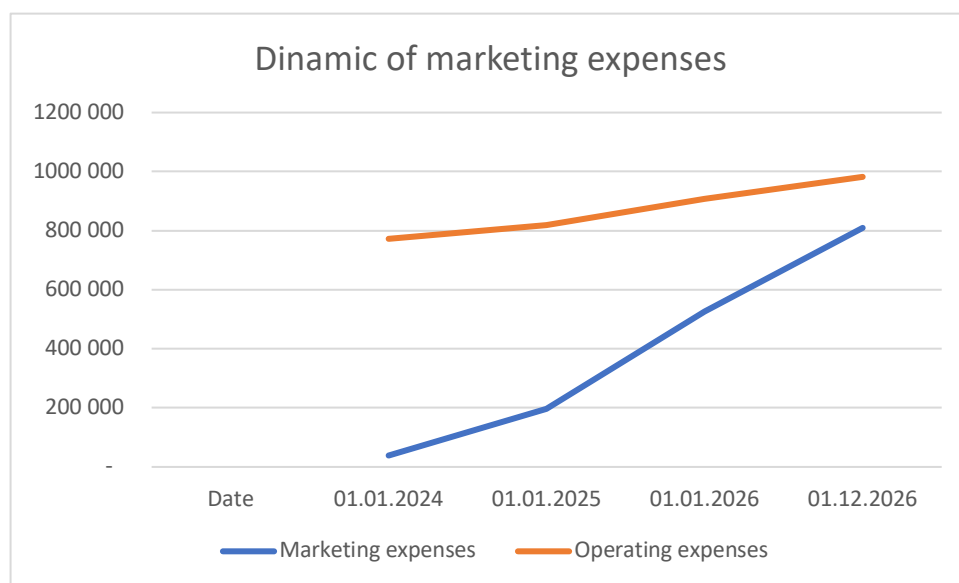
- Develop promotional giveaways that will draw users to the website via viral marketing methods.

- Establish relationships with advertisers that are targeting a computer savvy younger demographic.
- Develop an expansive online presence through the use of pay per click marketing and search engine optimization.

Marketing Strategies

The company intends to use a high impact marketing campaign that will generate a substantial amount of traffic to the site. These strategies include the use of search engine optimization and pay per click marketing. The Company's web development firm will place large amounts of linking text on the Company's website. For instance, when a person does a Google search for online casino websites, the Company will appear on the first page of the search. This strategy is technically complicated, and the Online Casino will use a search engine optimization firm to develop the Company's visibility on a non-paid basis. Management expects that a SEO firm 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. A majority of web portal and search engine companies use very complicated algorithms to determine a website's relevance in relation to a specific keyword. SEO firms place text and tags on the website to increase the rank of a specific website. Additionally, the 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 ranging from fifty cents to one dollar is charged to the Company's account. This strategy will be used until the Company gains momentum.

The company has developed a marketing budget to execute this strategy within the specified time frame. According to this budget, the growth rate of marketing expenses exceeds the growth rate of overall expenses. Marketing expenses are planned at 42% of GGR.



Client attraction and retention program

- Registration bonus (free bet).
- Referral program. Payments in cryptocurrency from each referral's winnings. Paid in the currency of the referral's winnings.
- Ranking system. Depending on the turnover, players receive progressive rakeback, a bonus for acquiring rank. Payments will be made in cryptocurrency.
- Rakeback. Return a certain amount of cryptocurrency from each bet placed. Payments will be made in cryptocurrency.
- Deposit bonus.
- Activation of promotional codes.
- Telegram bot for working with VIP clients and ordinary clients.

Overview of excluded markets

The Company does not plan to operate in certain jurisdictions. This is primarily due to international sanctions against individual countries. In addition, the laws of some countries either do not allow such activities or require special licensing permits.

Accordingly, the company will not conduct a marketing program in these countries, and will also prohibit access to its services from the territory of these countries.

Below is a list of excluded countries.

- United States of America and its territories,
- France and its territories,
- Netherlands and its territories and countries that form the Kingdom of Netherlands, including Bonaire, Sint Eustatius, Saba, Aruba, Curaçao and Sint Maarten (Аруба, Бонайре, Синт-Мартен, Синт-Эстатиус и Саба),
- Australia and its territories,
- United Kingdom of Great Britain and Northern Ireland,
- Spain,
- Cyprus,
- Austria,
- Democratic People's Republic of Korea (DPRK),
- Iran,
- Myanmar (Burma),
- The Democratic Republic Of The Congo,
- Russian Federation.

Financial plan

	Rate	01.01.2024	01.01.2025	01.01.2026	01.12.2026
Revenue	0%	100 000	507 111	1 360 904	2 095 050
Gaming duties	8%	- 8 000	- 40 569	- 108 872	- 167 604
GGR	0%	92 000	466 542	1 252 032	1 927 446
Other costs of sales	5%	- 5 000	- 25 356	- 68 045	- 104 752
Costs of sales	0%	- 13 000	- 65 924	- 176 918	- 272 356
Gross profit	0%	87 000	441 186	1 183 987	1 822 693
Marketing expenses	42%	- 38 640	- 195 948	- 525 853	- 809 527
Operating expenses	0%	- 772 423	- 819 970	- 907 961	- 982 257
Exceptional items	3%	- 23 173	- 24 599	- 27 239	- 29 468
Operating profit	0%	- 747 235	- 599 331	- 277 067	1 441
Adjusted EBITDA	0%	- 775 008	- 647 257	- 366 907	- 124 400
Exceptional items	0%	- 23 173	- 24 599	- 27 239	- 29 468
Share benefit charge	0%	-	-	-	- 1
Depreciation and amortization	5%	- 4 600	- 23 327	- 62 602	- 96 372
Operating profit	0%	- 747 235	- 599 331	- 277 067	1 441
Finance income	1%	920	4 665	12 520	19 274
Finance expenses	1%	- 460	- 2 333	- 6 260	- 9 637
Share of post-tax loss of equity accounted associate	0%	-	-	-	-
Profit before tax	0%	- 746 775	- 596 998	- 270 807	11 079
Taxation	22%	-	-	-	- 2 437
Net profit for the year attributable to equity holders	0%	- 746 775	- 596 998	- 270 807	8 641
Earnings per share	0%	-	-	-	-

Appendix 1. Gambling Software Partners

Partner	Service	Comments
BetGames	Gambling provider	Gaming platforms for casinos, live dealers and lotteries
Evolution	Gambling provider	Provides by 700-plus live tables/game show environments
Pragmatic Play	Gambling provider	A leading game developer providing player-favorites to the most successful global brands in the iGaming industry
TVBET	Gambling provider	Offers the widest selection of live games broadcast live
SPRIBE	Gambling provider	Offers next generation, engaging games for iGaming industry
Slotegrator	Gambling provider, aggregator	There are two possible ways to integrate suppliers: through an integrator or directly
BetRadar	Odds, video stream, TLS provider	Additional providers may be needed if BetRadar does not support the most popular sports

Appendix 2. Payment Service Partners

Partner	Service	Comments
Onchainpay	Cryptocurrency processing, legal support	1. Opening client wallets, depositing, withdrawing cryptocurrency, exchanging cryptocurrency for fiat 2. Development of compliance procedures, legal support
SumSub	Biometric identification, verification against sanctions lists, PEP, adverse media	Will be used to carry out KYC of players
Covery	Scam database	
Amazon	Datacentre	
Cloudflare	DDOS protection	