

Minimum Requirements for Business Plan - for Natural Nine B.V

An online gaming license application requires the inclusion of a business plan, which should contain, at a minimum, the following essential information:

1) Overview of the business products and services/brands as well as proprietary IP.

Shuffle.com is the only gambling platform that exists under the Natural Nine B.V entity. Shuffle.com went live in February 2023 and operates solely with the Curaçao Gaming License. Natural Nine is owned by Mixed Order Limited, a holding company in the British Virgin Islands. Xecutive Corporate Management B.V (XCM) is Natural Nine's professional service provider and corporate director.

Shuffle.com is the future of crypto betting with its state-of-the-art casino games and sports betting options. Shuffle.com's competitive edge is in its low latency website, appeal to the crypto community and its ability to quickly respond to users needs and innovate. For instance, our introduction to multiple pop-up sessions was a feature requested by a VIP player in 2023.

2) Company management structure showing key management roles and reporting lines.

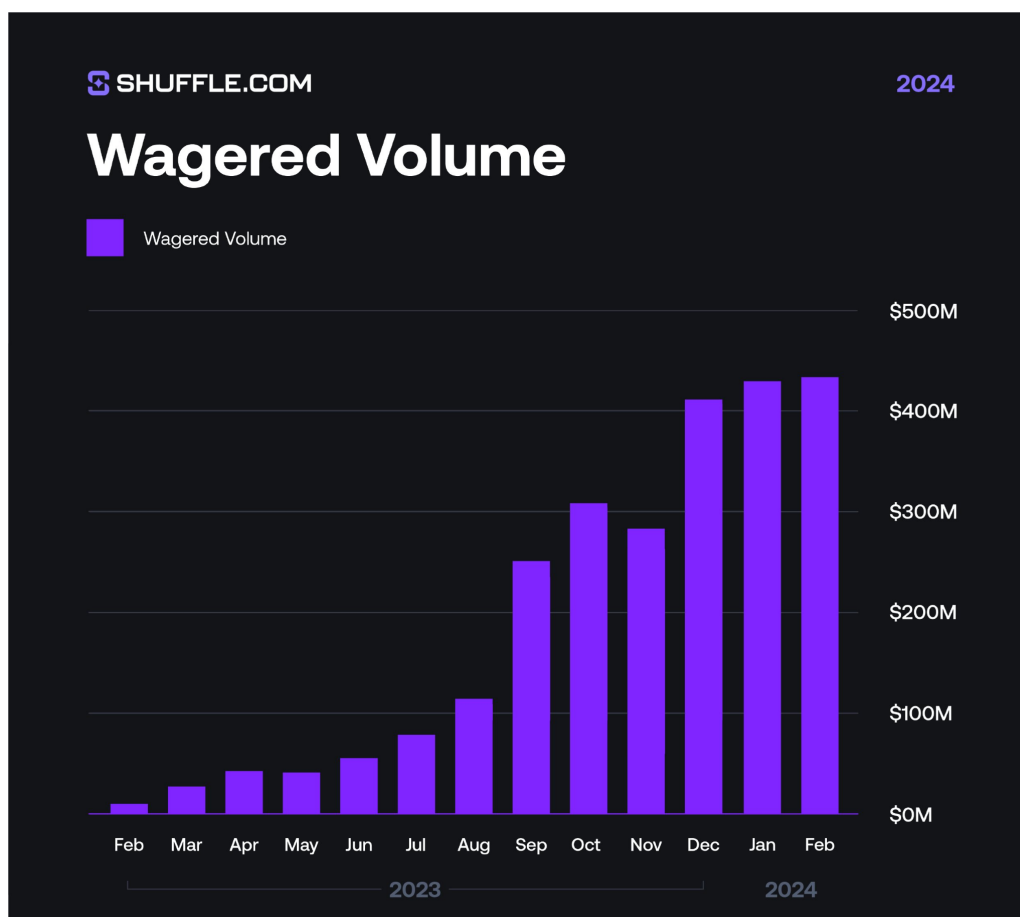
- CEO - Noah Dummett (AUS)
- CTO - Yang Li (HK)
- CFO - Xecutive Corporate Management BV (CUW)
- Head of Product - Darcy Spangler (AUS)
- Head of Business and Growth - Ishan Haque (AUS)
- Head of Data - Jay Stanic (AUS)
- Head of Support - Tom Robinson (AUS)
- Head of Compliance - Gintautas Sapranavicius (LTU)

3) Business forecasts for 3 years.

Shuffle's Projected Growth for the next 3+ years

Year	2024	2025	2026	2027
Wagered Volume	US\$10,000,000,000	US\$20,000,000,000	US\$30,000,000,000	US\$40,000,000,000
Gross Gaming Revenue	US\$130,000,000	US\$260,000,000	US\$390,000,000	US\$520,000,000
Net Gaming Revenue	US\$39,000,000	US\$78,000,000	US\$117,000,000	US\$156,000,000

Shuffle.com's first year of Growth



4) Overview of intended strategy for the business growth and to secure/maintain/grow market share with specific financial and marketing plans.

Shuffle has experienced robust growth despite not currently offering FIAT payments to its users and lacking a proper affiliate program to direct traffic to the website. Shuffle has allocated funds to hire a 'head of payments' and 'head of affiliates and partnerships to enhance Shuffle.com's visibility in our key markets.

Shuffle boasts an average of 1,000 daily active users and is recruiting additional support staff to support user growth. In 2023 Shuffle averaged 300 daily active users.

Below are quarterly updates that our investors have been receiving since the inception of Shuffle.com as well as monthly invoices procured from SoftSwiss, our gaming provider aggregator. While we acknowledge that past performance does not unilaterally dictate future growth these documents demonstrated operational acumen and should serve as a testament to our sound practices, which are poised to facilitate sustained growth moving forward.

ONLINE GAMING GUIDELINES

5) Who are the key suppliers and material dependencies?

The critical suppliers for Shuffle are;

- Softswiss - Gaming Provider Aggregator
 - Hacksaw, Pragmatic Play, Evolution, No Limit City, Play N Go
- FastTrack - CRM
- Genius Sports - Sportsbook Backend
- Chainalysis - Screening All Crypto Transactions
- Fireblocks - Crypto Asset Wallet Management
- Vercel - Front End Web Provider
- AWS - Servers base in Germany

6) Risk evaluation and management.

In addition, our dedicated team actively monitors player activity in real-time. Any suspicious or irregular activity, such as spikes in large betting amounts, uncommon betting patterns, or similar behaviors across multiple accounts, triggers immediate attention. When such irregularities arise, our team swiftly pauses activity, conducts thorough evaluations, and determines if any foul play or malicious activity has occurred. Remedial actions may include further account reviews, additional KYC (Know Your Customer) requests and reviews, temporary halting of deposits and withdrawals from suspicious accounts, and other measures aimed at ensuring fair play and security.

As players' bankrolls grow, game limits are gradually increased to accommodate their evolving needs. For large withdrawals exceeding \$10,000, Shuffle's support team diligently seeks approvals, ensuring a secure and seamless transaction process. Notably, betting limits on games like blackjack have evolved from a maximum single bet of \$5,000 to now reaching \$25,000, reflecting our commitment to providing an enriched gaming experience while maintaining integrity and security standards.

7) Legal and governance framework.

Example: Describe board oversight and current board membership and interaction with day-to-day decision making by senior management. What matters are reserved to board/UBOs? Can the board/company be deadlocked? Who provides legal support and advice? Who tends to be invited to board meetings in addition to the board members and what policy, if any, applies. Description of ESG policy (if any).

The board of directors currently consists of three directors with the goal to grow the directorship to 5 individuals. Day-to-day decision-making is made by the CEO Noah Dummett, and twice a year, the board and directors will meet to discuss business strategy and the direction of Shuffle.com. The latest board-level decisions that have been made are to implement FIAT onboarding for Shuffle's markets and an Affiliate marketing program as soon as possible. To do this, Shuffle will hire a new 'head of payments and 'head of Affiliates/Partnerships'

8) Target KPIs and business objectives

Our success and growth strategy hinges on closely monitoring key performance indicators (KPIs) that provide insights into our platform's operational health and strategic direction. These critical metrics include:

- Average Daily Active Users (DAU): Indicates engagement levels and community health. Rising DAU suggests effective user retention and a quality experience.
- Average Daily New Sign-Ups: Reflects growth potential and acquisition success. We analyse this to refine our marketing and targeting for sustainable growth.

- Average Daily Wager Total: Measures financial engagement by tracking the total wagers each day, guiding us in optimising game offerings for revenue growth.
- Average Daily Total Deposits: Essential for assessing liquidity and user willingness to invest, with increases signaling trust and financial health.

Focusing on these KPIs enables us to:

- Expand Our User Base: By evaluating daily sign-ups, we fine-tune acquisition strategies to reach a wider audience.
- Boost User Engagement: DAU and wager totals inform efforts to enhance the user experience, keeping our platform compelling.
- Ensure Financial Growth: Analysis of deposits and wagers helps manage our financial strategy and health.

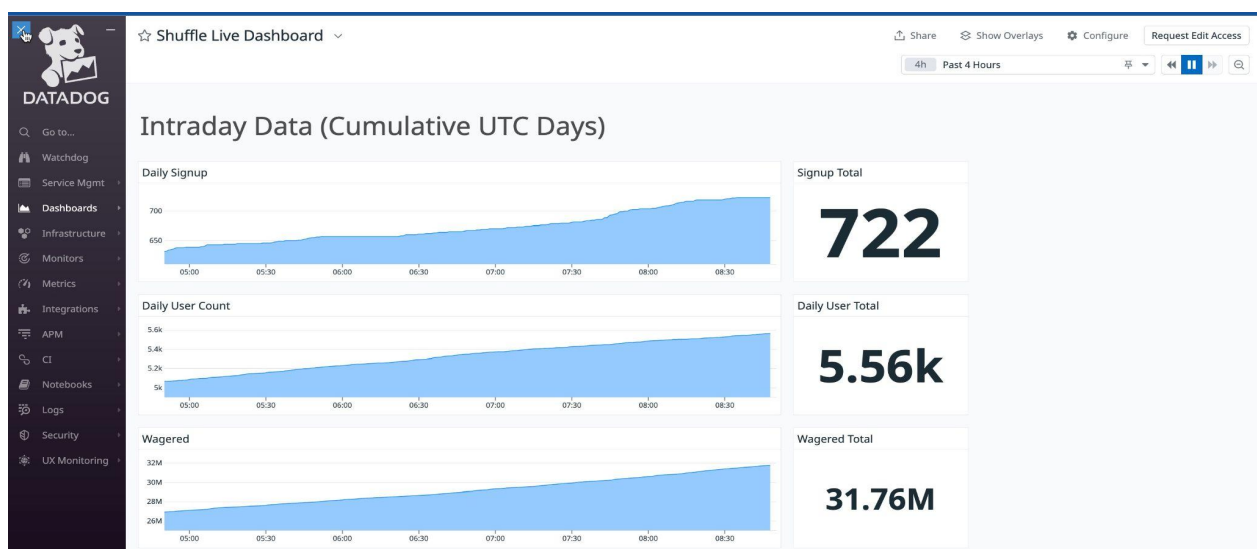
Together, these metrics offer a comprehensive view of our performance and guide strategic decisions for a profitable and user-focused platform, demonstrating our commitment to both immediate and long-term success.

Below is displays our actual performance in 2023 with our KPI targets set for 2024, 2025, 2026 and 2027.

Daily Average Metric Actuals and KPIs

Year	Sign Ups	Active Users	Wager (M)	Total Deposits (M)
2023 Actual Data	450	2650	\$7.75	\$0.43
2024 KPI	720	5560	\$35.00	\$1.50
2025 KPI	1500	11000	\$60.00	\$3.00
2026 KPI	3200	23000	\$120.00	\$7.00
2027 KPI	5000	35000	\$200.00	\$10.00

Sample View of Daily Dashboard taken 28/03/2024



9) Policies and Procedures

The day-to-day policies and procedures (P&P) are developed externally by Kingside Pty Ltd, our dedicated external servicing company. They handle various aspects of our operations, including customer service protocols, human resources guidelines, information security measures, and other internal processes.

Legal and regulatory policies, such as user terms of service, anti-money laundering (AML) policies, and privacy policies, are crafted by Unchained Limited, a specialised external company with extensive experience in law and regulatory compliance, particularly within the banking and cryptocurrency sectors.

After the drafting process, these policies undergo a final review and sign-off by XCM, our gambling industry experts. XCM ensures that the policies align with industry standards and regulatory requirements, providing additional assurance of compliance.

We are committed to keeping the Gaming Control Board (GCB) informed of our timelines and progress regarding the development and implementation of these policies and procedures. Furthermore, we acknowledge the GCB's mandate to audit or review these P&P following their submission and are fully prepared to cooperate with any such process to ensure compliance and adherence to regulatory standards.

Additionally, whenever there is a change or update to any policy pertaining to users, both the GCB and our users will be promptly notified, ensuring transparency and accountability in our operations.

Appendix;

Accompanying this Business Plan for Shuffle.com are the following documents confirming growth in the business to date.

- Monthly Invoices from SoftSwiss
- Quarterly Investor Updates for Shuffle.com