

BUSINESS PLAN

Swervy International B.V.

Korporaalweg 10, Curaçao

Strictly Private and Confidential

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1. EXECUTIVE SUMMARY

Swervy International B.V. (“Swervy”) or the (“**Company**”) is a Curacao entity incorporated on the 14th of September 2017, Registration number 144876 in order to establish a business to customer (“**B2C**”) remote gaming operation, targeting end-users based in Canada and New Zealand. As such Swervy is applying for a Curacao Master Gaming License from the Curacao Gambling Control Board (“GCB”) to facilitate the intended business pursuit.

Swervy will operate under various pre-existing brands such as wolfwinner, leroijohnny, casiojoka, joclubvip, johnniekashkings, houseofjack, wildcardcity, pokiepop, jokaviproom kingjohnnie, jackpotjill, casino-mate, jackpotpotjillvip, stellerspins, and casinojoclub. Each of these online casino's is a place for the rough riders, big shots, high rollers, and players who simply love the thrill of the game.

At the online casino, you can take your pick of wild slots with exciting themes and massive jackpots. Every slot has a unique theme, from roaring dinosaurs to space adventures, medieval sword fights and journeys through ancient lands... The possibilities are endless and the wins ready to blow! There's also a sweet soiree of Baccarat, Roulette, Blackjack, Video Poker and more.

Swervy intends to provide a portfolio of RNG gaming products and services. The Company's full suite of games will be easily accessible to customers from the comfort of their homes.

By way of background, Dennis Ho, the CEO has been in the e-gaming industry since the early 2000's. The business was originally licensed in Kahnawake from 2001 to 2007 using the brand Crazy Vegas Casino, Golden Riviera Casino, River Nile Casino and 777 Dragon Casino. The company then obtained a Malta license in 2007 and operated until 2017 under a Microgaming platform using the same brands. The change of license from Kahnawake to Malta was due to Microgaming's requirements. Subsequently, the platform was changed to a Curacao license as recommended by our platform provider in February 2017 to date, under the iGaming Cloud Platform & now under Enexus Solutions Limited platform.

Unique features and Competitive Edge

Our casinos are run with a wide spectrum of customer engagement and satisfaction mechanics which allow for consistent, top of the line experiences, making us an obvious choice for prospective players that appreciate high quality brands and products.

To keep customers engaged from the very first deposit, over and above the welcome offer, we employ exciting daily offers, lifecycle customer journeys, regular promotions and tournaments, engaging gamified loyalty programs including a bonus shop and wheel of fortune, a large selection of game providers and payment methods, a dedicated VIP hosting service that make sure players can get the best from all of the above listed elements; we also have superior customer support around the clock. Following changes in the Curacao licensing Regime, we have made the decision to

consolidate many of our licenses. Consequently, Swervy has been retained to provide gaming products and services, subject to obtaining the GCB License.

This business plan provides a detailed forecast of Swervy's intended gaming operation as a B2C operator. In the pages to follow, the Company's business strategy, ownership structure, model, product offering, and internal control systems will be disclosed in greater detail.

2. BUSINESS STRATEGY

Swervy's mission is to become a leading provider of casino RNG products. The Company intends to deliver the gaming content to as many jurisdictions as the GCB permits, with the main target markets in New Zealand and Canada. Both target markets that speak fluent English. The Company will continue to target English speaking grey markets with a view to extending the Company's offering further afield to continents such as Asia, LATAM and Africa.

The Company aims to provide unique, innovative and competitive content which is fast, easy and enjoyable, whilst protecting customers and their funds.

To achieve its intended goal, Swervy has developed a strategy focused on three key aspects:

- (i) Establishing a safe, user-friendly, and enjoyable website;
- (ii) Offering competitive content; and,
- (iii) Building a creative, efficient and agile brand.

The heart of the Company's business strategy is engaging with reputable partners who will support Swervy in its endeavour to become a world-class operator. The Company intends to engage with a wide range of third-party providers for the supply of software, branding, hosting, customer services and marketing. Swervy will only engage with partners who prioritise responsible gambling and operate according to the international regulatory standards of Anti-Money Laundering ("**AML**") and Countering the Financing of Terrorism ("**CFT**"). As such, prior to any engagement, third-party providers will be required to undergo thorough due diligence checks as part of the on-boarding process.

In order to maintain a safe, user friendly and enjoyable website, the Company will engage with various third-party software suppliers for the provision of the branding, front and back office and games portfolio.

The Company has engaged with Enexus Solutions Limited for the creation of the Company's cutting-edge software platform. The website is geared to driving customer satisfaction and enhancing the user experience. The front-platform will allow customers to easily create an account, browse through the suite of products, deposit funds and place bets. In addition, the front-platform will have a designated responsible gambling page which will provide advice on stake/bet limits, self-exclusion and links to

support agencies. For further details on the website, refer to Section 5 below.

Customers who successfully complete the registration process will be given access to the Company's gaming products and services. In order to successfully register and access the Company's content, customers will be required to provide their identity information and accept the Terms and Conditions of the website. No player under the age of 18 will be permitted to register with Swervy. In addition, known problem gamblers and gamblers who have been excluded from the website will not be permitted to register. For further details on the registration process, refer to Section 7 below.

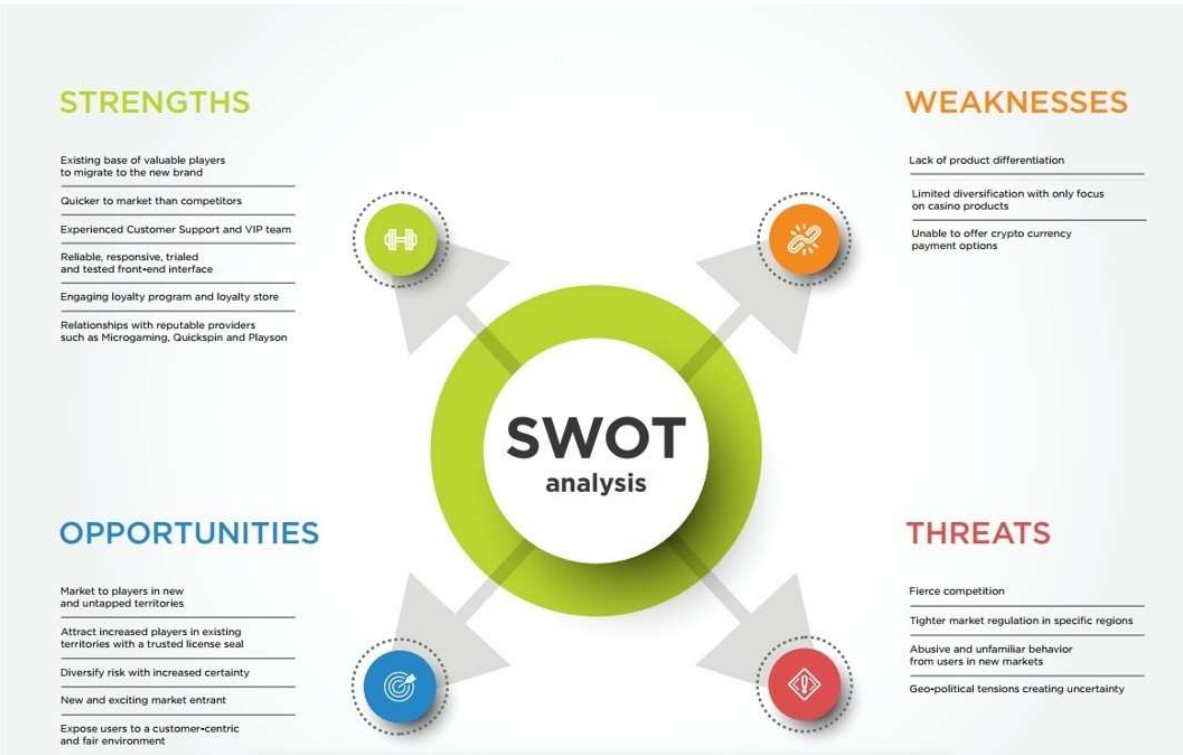
The Company will engage with multiple third-party games providers such as Betsoft, Bgaming, Booming, Booongo, Felt, FlatDog, Gamehub-evolution, Games Global, Gamehub-netent, G.Games, Habanero, iGTech, ISBWazdan, ISoftBet, Mascot gaming, Microgaming, Pariplay, PGSoft, Play N Go, Platipus, Playson, QuickSpin, Qora, Red Rake, Reevo, Redrake, Relax, SoftSwiss BGaming, Yggdrasil, Spinomenal, StakeLogic, Swintt, Tom Horn, Vivo, Wazdan and 1spin4win. The third-party games are designed to integrate seamlessly with the Company's software platform.

As previously mentioned, Swervy has engaged with Enexus Solutions Limited for the provision of a fully functional robust platform system which includes a back-office system to service. Swervy will be able to continuously assess and manage players and maintain a safe playing environment. In addition to the above, the back-office includes sophisticated tools for customer relations management, affiliate management, bonus/promotion management, control of refer-a-friend schemes etc. For further details on the back-office platform, refer to Section 5 below.

To drive players to Swervy's website's, the Company continues to undertake marketing efforts across an array of verticals, which will include search and display advertising, email networks, affiliates and search engine marketing and optimization. Swervy has chosen the above marketing channels based on the Company's objectives and the marketing efforts which are known to attract players. For further details of the marketing strategy, refer to Section 11 below.

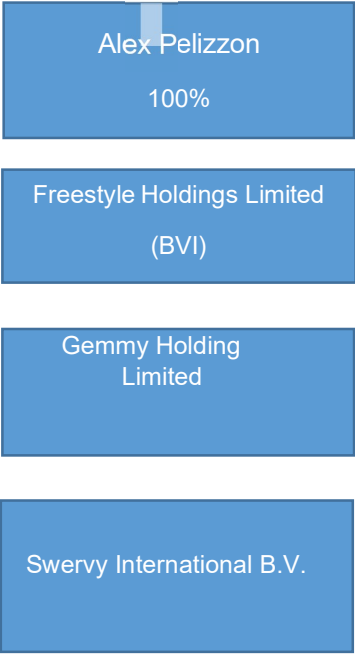
Swervy understands that in order to succeed in the current competitive gaming market, the Company needs to build and maintain a creative, efficient and agile team. Swervy will operate largely through the support of its third-party providers, for the provision of corporate management, governance, customer services support, financial services and reporting. For further details of the Company's key partners refer to Section 4 below.

SWOT Analysis



3. OWNERSHIP STRUCTURE

The below organisational diagram illustrates the ownership structure of the Company.



Freestyle Holdings Limited

Freestyle Holdings Limited is a BVI entity, company number 2074904 with registered office at Level 1, Palm Grove House, Wickhams Cay 1, Road Town, Tortola, BVI.

100% owned by Alex Pelizzon.

Gemmy Holding Limited

Gemmy Holding Limited is a BVI entity, company number 1951501 with registered office at Level 1, Palm Grove House, Wickhams Cay 1, Road Town, Tortola, BVI. Freestyle Holdings Limited is the 100% owner of Gemmy Holding Limited. Gemmy Holding Limited will hold 100% of the shares in Swervy

4. BUSINESS MODEL

4.1 Business Model

Category	Vendor/Service	Description
Coinspaid	Coinspaid	PSP
	Interac	PSP
	Instadebit	PSP
	Neosurf	PSP
	Ilxium	PSP
	Enexus Solutions	KYC Portal
	Payment Execution	Bank
	Verpakt Management	Call Centre and HR
	Media Silo	Finance
	Media Manta	Marketing
	Global Media	Compliance and Risk
Tech & Dev	Certria	Hosting Provider
	Enexus Solutions	Platform Provider
	See list in section 2	Game Providers
	My Affiliates	Affiliate Program
	Skye Media	IT Service Provider

4.2 Key Officials

Shareholder – Alex Pelizzon

Alessandro Pelizzon has been involved in the gaming industry for many years, initially advising clients on Compliance and AML issues. He began his career as a trader in the Capital Markets and then spent more than twenty years with a growing involvement in risk management, as an anti-money laundering officer and general Compliance Officer for various entities. Alessandro holds a bachelor's degree in business from the University of Geneva (Switzerland) and an MBA from the Darden School of Business (University of Virginia, USA).

Directors

XCM Directors

- **Lorenza Godett**
- **Christopher van Rosberg**

Key Individuals

Dennis Ho – Chief Executive Officer

Dennis has 20yrs in the Casino industry working for Verpakt. The earlier years were involved in the affiliate and customer facing aspects of the business, and the recent 15 years were more involved on the finance treasury side of the casino operations.

Craig Murugan – Chief Operations Officer

Craig has over 15 years' experience in the online gambling industry. Craig is Operations Officer at Global Media State and is responsible for looking after all departments including VIP Department, Risk, Contact Centre, Training and QA teams

Gary Ermann – Chief Financial Officer

Gary has over 25 years in the corporate sector. Gary holds extensive experience in the management & administration of a wide portfolio of companies, in the following sectors auditing, banking, hospitality, aviation, private equity & gaming (4 years) with a financial focus in his current role. Gary is a Chartered accountant & member of the South African Institute of Chartered Accountants (SAICA).

Adrian Maistry – IT and Technology Officer

Adrian has over 27 years in the corporate services sector. Adrian holds extensive experience in the IT sector, specifically in banking, & online gambling gaming with his current role being Chief Information Officer. Adrian holds a National Diploma in Information Technology.

Nadia Du Toit – Regulatory Compliance Officer

Nadia has over 4 years in the corporate services sector. Nadia holds extensive experience in the IT sector, specifically in online gambling (3 years) with her current role being Compliance Officer. Nadia holds a Degree in Law.

4.3 Operational Structure

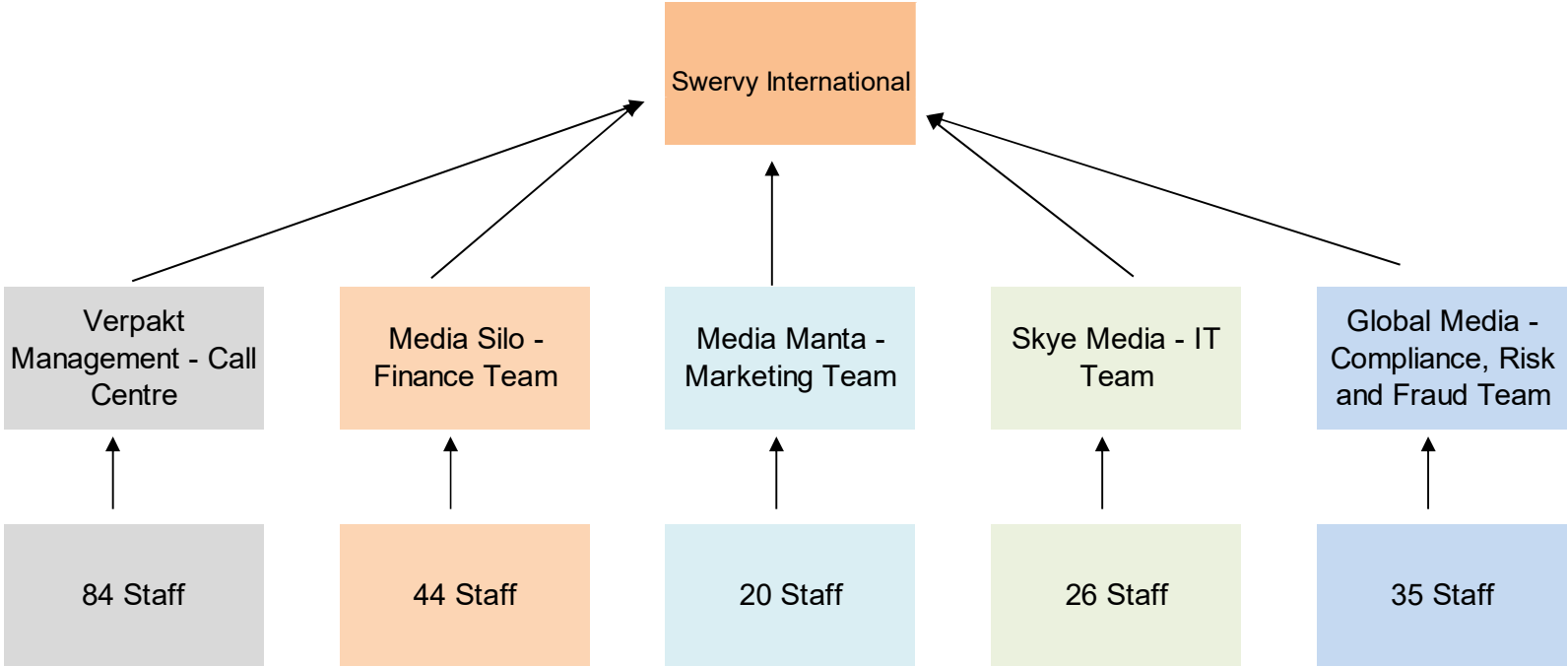


Figure 4: Swervy Key Staff Structure

4.4 Key Roles and Responsibilities

Swervy Management

The management team is responsible for the below:

Day to day compliance with attention to the anti-money laundering obligations within the areas of the Company for which they are responsible;

- Ensuring that the Compliance Officer is provided with prompt advice in cases of unusual/suspicious transactions and other matters of significance;
- Providing the Compliance Officer with the appropriate resources to fulfil the function effectively;
- Ensuring that the Compliance Officer has complete autonomy in the suspicious activity report evaluation process and unfettered access to information necessary to carry out that process; and
- The Management and Compliance Officer will ensure that he/she is provided with or has access to the necessary resources to keep up to date with new money laundering requirements and developments.

Swervy Service Providers

All employees are responsible for the below:

- Remaining vigilant to the possibility of money laundering;
- Reporting to the Compliance Officer all knowledge or suspicions of potential money laundering activities; and
- Complying fully with all money laundering procedures in respect of client identification, client monitoring, record keeping, vigilance and reporting.

Swervy Directors

Any directors overseeing the business are subject to the general duties of the Company. The following list expands on those general duties of directors:

- Directors must have general knowledge, experience and skills appropriate for their post;
- They must act reasonably;
- They must act in the interests of the company;
- They must take steps to understand the affairs of the Company they are managing;
- They must avoid conflicts of interest and declare them should they arise;
- They must not profit privately from the Company's business at the expense of the Company;
- They must act independently of intimidation, coercion, influence and so forth;
- They should attend regular board meetings;
- They should ensure minutes are kept and are drafted promptly at board meetings;
- They should ensure that significant transactions are approved and noted to

- provide an account of the decision making process;
- They should take legal/financial advice if they know their company is in financial difficulty;

Swervy Operations Management

The duties falling to management are as follows:

To present an overview of the structure and organisation of the prospective license holder during the application process and to be able to field questions relating to:

- Company Strategy;
- Business Plan;
- Corporate and Organisational Structure;
- Financial Projections;
- Business models and licensing implications;
- Banking and flow of funds/monies through the organisation; and
- Player protections method of choice;
- To ensure player accounts are ring-fenced guaranteeing protection of player funds;
- To ensure that the license holder remains socially responsible in its operations by excluding youth, crime, unfairness and problem gambling from its operations;
- To respond to requests made by the Commission in a timely manner;
- To ensure that anti-money laundering directives in force at the time are complied with; to provide evidence of this upon request; to report suspicious transactions as and when they arise;
- To notify changes in planning, operation or control to the GCB in accordance with the guidance offered in section 4.4 of this guidance; and
- To provide for regular audits to the required standard as defined in the license conditions.

Swervy Compliance Officer

The Compliance Officer is responsible for the below:

- Developing necessary policies, procedures, training and education of staff;
- Developing and maintaining policies in line with evolving statutory and regulatory obligations and experience/advice from enforcement agencies;
- Representing the company to all external agencies and any other third party making enquiries in relation to Money laundering prevention or compliance;
- Ensuring that all parts of the Company are complying with the stated policy and therefore monitoring operations and development of the policy to this end;
- Undertaking the internal review of all suspicions and determining whether or not such suspicions have substance.

4.5 Risk Management

Change is ever present in our business environment, impacting our environment and business whether directly or indirectly. Swervy management and the Board constantly, evaluate the scenarios, and the impact these changes make to our business by regularly checking the below (the list is not limited):

- News Reports
- Business & Corporate News,
- Financial Markets,
- Industry Specific reports
- Country specific reports
- Marketing reports
- Regulatory bodies
- Management Accounts
- Annual Financials

Issues are presented and discussed during Weekly meetings and Monthly Meetings. Where required counsel is sought from Business Advisors ie legal, financial, audit & tax, also Industry specific experts.

4.6 Target KPI's and Business objectives

Our target KPI's that the business are measured on comprise of the below:

- NGR
- Deposits
- Active player Accounts
- FTDs
- Purchases per player
- Profitability by channel, ie, Affiliates, SEO, FTD's, Campaigns etc
- Conversion
- Retention Rate
- Comp to Purchase
- Net profit

Business Objectives:

- Maintain high levels of deposits from the existing base
- Increase player value by keeping users engaged
- Ensure retention rates are high within the 70-80% range
- Steady growth through constant acquisition
- Allocate bonuses in such a way that maximises engagement and sustainability

while remaining within budget.

4.7 Key Partners

Certria

Swervy engages Certria for their data management, hosting and communication services. For 20 years Certria have been focused on the delivery of market-defining internet technologies, products and services. Certria provides the business with secure, reliable facilities and networks to support critical infrastructure.

Certria provides a range of infrastructure hosting solutions. Everything from pure co-location from a range of world class centers, up to fully managed hosting solutions where they take away the burden of managing our IT infrastructure.

Enexus Solutions

The eNexus team has over 20 years' experience creating, developing and maintaining online technology platforms that focus directly on operations, payments, risk management and user interaction.

Their team of technology architects grows, our ability as a business develops exponentially.

As experts in their field, their team is continually developing technology platforms that allow customers from various industries to manage multiple brands, monitor customers' account activities through the activity monitoring dashboards, plus design and implement marketing campaigns including marketing and promotions schemes.

5. SOFTWARE PLATFORM

The Company's platform is provided by Pragmatic Solutions via Enexus Solutions Limited ("Enexus"). Enexus provides a Fully API based Platform (PAM) for gaming and betting built with a modular approach.

This platform provides a single point of management for all gaming systems, payment processors, bonus systems, responsible gaming and third party services such as regulatory compliance, identity verification and affiliate management.

Platform Key Features

- Flexible, Modular and Fully API Based
- Integration Hub with All Major Providers Integrated
- Complete UI Control and Powerful CMS
- Over 250 APIs Available
- Back Office, CRM and Wallet
- Certified and Regulated
- Stable, Scalable and Blazing Fast



Platform & Technical - Why Enexus Platform?

Modular and integration-focused - Thanks to its modular, API-based design, the Enexus platform allows for easy integration of any third-party product or service available on the market.

Proven track record - Having been in successful operation for four years, and handling volumes of close to 500M GGR annually, the platform has proven its ability to manage volume and scale with ease.

Regulation-focused - Because of the way the Enexus Platform was developed, it allows for easier certification for additional regulated jurisdictions. They currently operate in multiple jurisdictions within the environments of their operator clients.

Business-oriented - With a focus on the long-term, the Enexus approach to client relationships is one of pragmatism, availability and a shared investment in future success.

Easy to use - With its intuitive capabilities and built-in automation, the Pragmatic platform allows for drastic improvements in operational efficiency with significant reductions in operational costs.

5.1 Back-Office Platform

Swervy is engaged with Enexus for the supply of the back-office platforms for all brands. The back-office system includes a full bouquet of reporting tools to allow full visibility of game performance and risk management. The system has been designed to be fully compliant with reporting requirements and reports can be run on almost any aspect of the site's overall performance and for individual player behavior. Player activity reports can be performed detailing customer's betting activity, financial transactions, history etc. In addition, the back-end contains sophisticated tools for CRM, affiliate management, bonus/promotion management etc. All operational aspects of the business can be controlled and monitored within this software.

The reports will generate the following data:

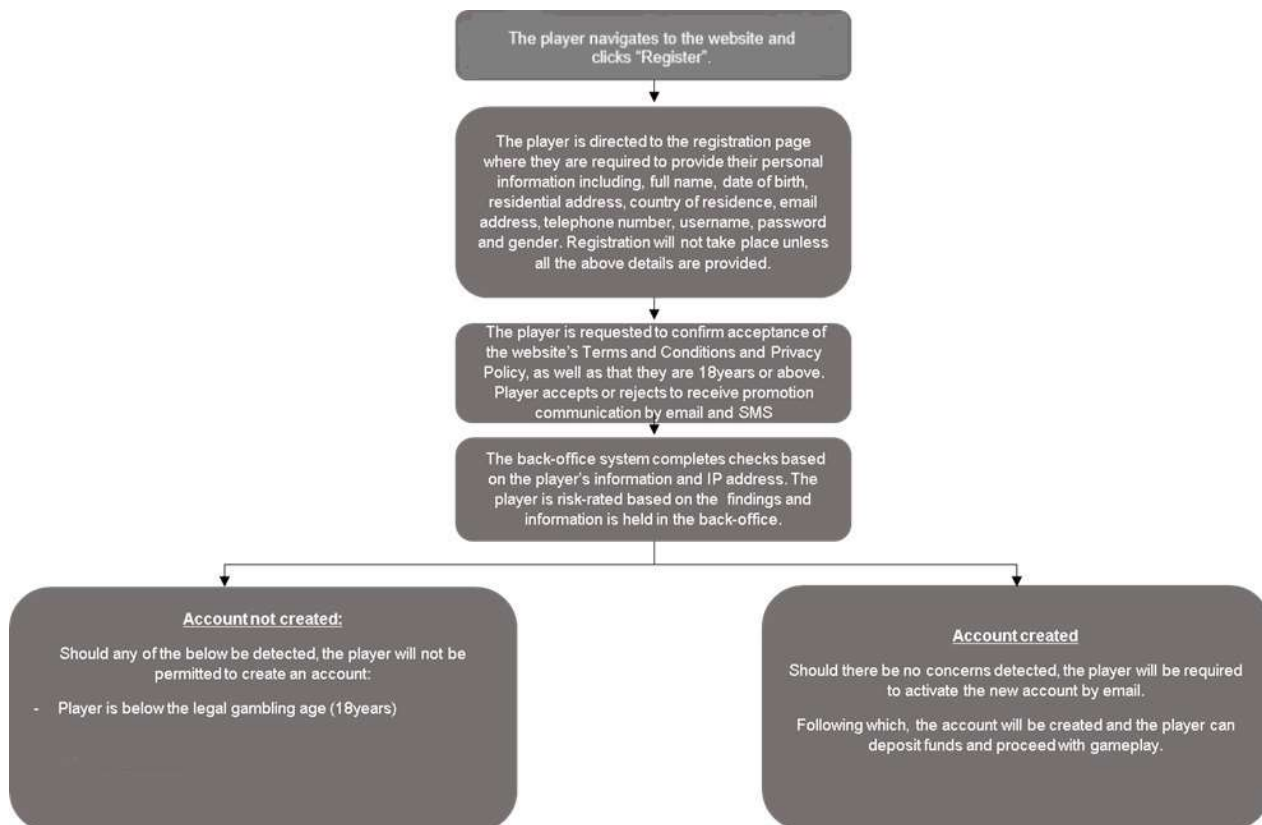
- the identity of the customer,
- the time the game/tournament started.
- The sums placed by customer placed in the game/tournament (time stamped)
- the game/tournament status (in progress, complete, etc.);
- the result of the game/tournament (time stamped);
- the time the game/tournament ended;
- amount won or lost by customer;
- the balance on the customer's account at the end of the game/tournament;
- the currency used by the customer.

The above data will be stored for a minimum of 5 years.

6. NATURE OF GAMES / OFFERING

In line with the Company's commitment to provide a wide and unique range of game offerings, the Company will engage with various third-party game providers. Swervy is dedicated to giving players a number of ways to enjoy online gambling by offering games from multiple providers such as Betsoft, Bgaming, Booming, Booongo, Felt, FlatDog, Gamehub-evolution, Games Global, Gamehub-netent, G.Games, Habanero, iGTech, ISBWazdan, ISoftBet, Mascot gaming, Microgaming, Pariplay, PGSoft, Play N Go, Platipus, Playson, QuickSpin, Qora, Red Rake, Reevo, Redrake, Relax, SoftSwiss BGaming, Yggdrasil, Spinomenal, StakeLogic, Swintt, Tom Horn, Vivo, Wazdan and 1spin4win. The third-party games are designed to integrate seamlessly with the Company's software platform.

7. PLAYER REGISTRATION CHECKS



7.1 Registration Process

Swervy will not enter into, carry on an ongoing customer relationship, or carry out an occasional transaction with or for a customer unless the customer successfully completes the registration process which includes providing their identity information and accepting the terms and conditions of the website.

In order to register an account, customers will be requested to provide the following personal details:

- Full name;
- Date of birth;
- Residential address;
- Country of residence;
- Email address;
- Telephone number; and,
- Currency

Registration will not take place unless all the above details are provided. No player under the age of 18 will be permitted to register with Swervy. Duplicate accounts will not be allowed and checks will be made at the time of registration. Known problem gamblers and gamblers who have been excluded from the Company's website will not be permitted to register. Customers cannot deposit funds unless they have successfully completed the registration process.

Upon completion of all required registration fields and confirmation of the acceptance of the terms and conditions, an email is sent to the registered user using the email address provided. To activate the account, the customer will be required to re-log on to the respective domain using the link provided in the email or SMS. Upon successful input of their password, their account will be activated.

7.2 Player Identification Process

The company's user agreement/Terms and Conditions expressly states that full disclosure of documentation may be requested from a customer for the purpose of verifying their identity and place of residence. A customer who has been requested to submit documents will not be able to withdraw funds until the documents have been received and the KYC department has manually reviewed the account. The accounts of customers who refuse to submit documents will be closed and balances returned. Customers who are not registered will not be allowed to play with real money. The company will verify that the registered person is a natural person and that they are above the age of 18 years.

The Company will implement various mechanisms to prevent duplicate accounts from being registered on the website. In the event that a player attempts to register a secondary account, the registration system will detect information provided for certain fields and if it can match two or more fields to an existing account, it will be flagged as

duplicate and will not be accessible for the purpose of gambling activities. The same process will apply for players attempting to circumvent their self-exclusion period. Blocked accounts will be visible to staff within the back office and a report to extract this data can be easily created.

Customers may only be permitted to register accounts with information that is true to their natural identity and can be evidenced by KYC documentation. The creation of fictitious accounts will be mitigated by the verification checks run on each account registration, however should a player succeed in creating a fictitious account, this will be detected by the staff and the account will be closed immediately.

7.3 Customer Risk Assessment

Swervy takes a zero-tolerance approach to all financial related crimes, and thus, the Company has established vigilant processes to help identify and combat Money Laundering (“**ML**”) and Terrorist Financing (“**TF**”). Amongst the controls implemented, Swervy has developed a set of AML/CFT risk parameters to assess each customer who registers on the website. Customers will be categorised as either ‘low’, ‘medium’ or ‘high’ risk depending on the information provided. Based on their rating, the relevant level of customer due diligence will then be applied to each participant’s account and reviewed on an on-going basis as part of the monitoring procedure.

AML/TF risk assessment is not a one-off exercise, therefore, Swervy has systems embedded in their back-office to continuously assess the risk level of players.

The major factors that determine the category of the customer include:

- Nature of customer;
- Location of the customer;
- Amount of funds being transacted; and,
- Nature and frequency of the transactions.

Although the above factors determine the risk rating of the player, the Company is aware that some risk indicators for instance high and frequent transactions which would be ordinarily be indicative of ML/TF, may in some cases be a sign of other issues such as problem gambling. Combatting problem gambling is equally as imperative to the Company as tackling ML/TF therefore the risk assessment will be valuable.

7.4 Record Keeping and Retention

Swervy will maintain identity records (information, verification and evidence) of all customers and their associated transaction records (between first registration and last activity).

The data will allow Swervy or the authorities to construct an audit trail in the event of any suspicion. All records are confidential and therefore securely held when not being processed.

The Compliance Officer and senior management including the Designated Official, Operations Manager and Directors will have unlimited access to all the records. All data will be stored for at least 10 years after the relationship has ended., However, for

any customers who are the subject of a suspicious transaction report, records will be maintained.

Records to be retained by Swervy include the below but is not limited to:

- Registration details;
- Identity documents;
- Financial transactions (deposits, bets made, withdrawals, prize payments);
- Unusual transaction reports;
- Audit trails;
- Suspended accounts and reason for suspension;
- Excluded players; and,
- Closed accounts.

7.5 Duplicate Accounts and Self Exclusion

Swervy has implemented a number of mechanisms to prevent the creation of duplicate accounts from being registered on the website. If a customer attempts to register multiple accounts, the system will detect the information provided at the registration stage. The system will detect information provided for certain fields and if it can match two or more fields to an existing customer account, this will be flagged as a duplicate account and will not be accessible to the customer. The same process applies to customers attempting to bypass a self-exclusion set on another account.

Staff will have visibility to the accounts which are blocked via the Back Office and the software used, will allow the Risk Team to review accounts and extract any data for regulatory reporting requirements.

7.6 Fictitious Accounts

Customers may only register accounts with information that is true to their natural identity and can be evidenced by Customer Due Diligence “CDD” / Know Your Customer “KYC” documentation. The creation of fictitious accounts should be mitigated by the verification checks run on each account at registration. Nonetheless, should a customer succeed in creating a fictitious account, this will be detected by various reports in place by the Fraud team and a decision will be taken whether or not the account is to remain closed.

Prior to approving a withdrawal request, the Fraud team will review device sharing, IP sharing, log-in/log-out history, relation to known offenders, and gameplay preferences. These are all primary indicators of Multiple Account Abuse (MAA).

Should MAA be suspected, the suspect accounts will be frozen, and a ticket created to investigate the potential abuse. This will mandatorily include an Enhanced Due Diligence (EDD) request from the suspected customer. If a fictitious account is confirmed, the account will be closed and funds subject to confiscation as provided by our Terms of Service.

7.7 Account Closures

If a customer decides to close their account permanently, the player will need to contact Customer Services to notify them of such a request. The player will be required to provide their username and contact details. All account queries and changes are subject to verification prior to assisting in any account related matters.

7.8 Blocked Territories

Individuals based in illegal jurisdictions are forbidden from registering an account with Swervy..

Swervy implemented various steps to prevent customers registering an account that is located in blocked territories and these are removed from the registration drop down list. If an individual manages to circumvent the measures in place to prevent account creation from blocked territories, the account will be immediately closed upon detection.

Upon closure of an account that has managed to circumvent our measures in place to prevent account creation from banned territories, any winnings gained through our platform and held in the customer's account will be automatically forfeited and only deposits returned. Any definitions on illegal jurisdictions can be found within the T&Cs.

8. PRIVACY POLICY

Swervy intends to maintain the utmost available means to ensure that the personal information provided by clients is protected at all times., The Company Privacy Policy, details the information which is collected and how the information is used. Swervy will process customer's information in accordance with the Privacy Policy.

Data Protection Officer for Swervy is Nadia DuToit

9. MARKET ANALYSIS

9.1 Target Jurisdictions

Over the last 5 years, the online gambling industry has witnessed a significant growth worldwide. Even in light of the Covid-19 global pandemic, there has been a spike in the number of users of online gambling platforms. In 2019, the global online gambling market size was valued at USD 53.7 billion, this figure is expected to increase at a compound annual growth rate (“**CAGR**”) of 11.5% between 2020 and 2027¹. The increase in the online gambling market is a result of several drivers such as technology advancements, increased accessibility of gadgets such as mobile phones and high internet penetration. Moreover, with easier access to online gambling due to legalization and cultural approval, there are more and more players registering on gaming websites. Encouragingly, the recent trend in governments regulating online gambling is leading to an opening up of additional regulated online markets which will boost market growth further. With the growth in the eGaming market, there has been a growing demand for different betting options and game types, even though there are various big operators active in the market. Swervy intends to capitalise on the market

opportunities and provide gaming products and services to New Zealand and Canada, both target markets that speak fluent English. The Company will continue to target English speaking grey markets.

10. PROFILE OF PLAYERS

Through the brand, Swervy aims to primarily target players who fall under the below demographic:

- English speaking;
- Casual gamblers; and,
- Able to access and prefer online content.

11. MARKETING STRATEGY

The following mechanisms and channels are the most commonly used methods to attract customers:

Affiliate Marketing

Affiliate marketing is and will continue to be one of Swervy's primary strategies for entering any market. Taking into account the specific nature of a given region the business will take advantage of affiliates who will promote our products by earning a small share of the profit generated per player or with a one off pre- negotiated value per acquisition.

The affiliate partner basically insures covering of all his initial marketing costs, website production and maintenance costs, their search engine optimization skills and database, which is monetized by selling products like ours.

Acquisition

We have proven player acquisition strategies and existing, reputable affiliate contacts that will allow us to drive traffic to our target markets and build strong, thriving brands with a stable and growing customer base.

Our team managing the affiliate relations and operations of the business under an affiliate program, is comprised of dedicated experts with strong knowledge and relations in the industry, built over the years.

My Affiliates

Our affiliate program will also benefit from the services of the reputable affiliate software management provider, MyAffiliates, several times voted best affiliate platform in the industry.

With these two main advantages we are sure to acquire the best partners in the business (affiliates, webmasters, media companies, forum moderators, etc) to direct their traffic to our brands for a long term and successful partnership.

The following mechanisms and channels are the most commonly used methods to attract customers:

External Marketing

- Online media;
- Pay-per-click (PPC);
- Search Engine Optimisation;
- Affiliates.
- Streamers; and
- Influencer marketing

Internal Retention Marketing

Swervy uses a number of tools and mechanics such as:

- Emails;
- SMS;
- Web popups;
- Site banners;
- Promotions;
- Direct Mail; and
- Web push

Daily Offers

We have crafted a series of intriguing daily offers to make with a variety of ways available to players to continue engaging with the same brand while having a constantly novel experience. Some examples of our daily offers include:

- **Mystery Mondays:** Players make a deposit to unlock a random lucky deposit bonus, ranging in size from 40% up to a 100%.
- **Twisted Tuesdays:** This bonus gives players a choice between a 60% Match, 60 Free Spins or a 40% bonus plus 20 Free Spins.
- **Until time Runs Out:** Players can receive a 75% deposit match up until \$10000 has been claimed on the day, adding a race element into an unassuming part of the customer interaction, and creating an exciting deposit incentive.

Customers receive regular mails and updates about the latest offers from our Customer Relationship Management team to make sure that they are always aware of offers available to them.

Some of our other offers include Free Spins, others include Flexible Free Spins. This approach means that playing at our casino is a different experience every single day.

Lifecycle Customer Journeys

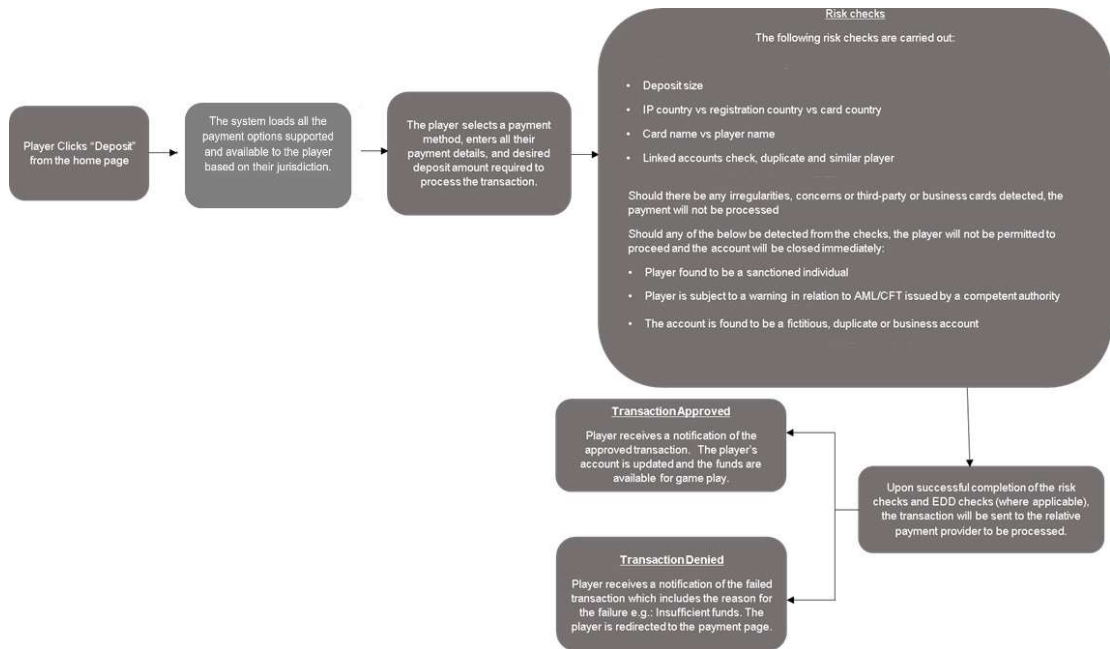
Depending on a player's stage in their customer lifecycle, they will enter a stream of offers and communication channels that are specifically tailored to their actions and behavior. In most cases offering more aggressive bonuses to encourage a player to remain with the brand or return to the brand:

- Non-Depositors
- New Players
- Risk of Churn
- Churn
- Late Churn
- Dormant

Our User Journey Setup process is a collaborative effort involving key stakeholders across

various departments, ensuring a comprehensive approach to user engagement and retention strategies.

12. PAYMENT SCHEMATIC
Customer Deposits – Flow



Customer Withdrawals – Flow



13. TECHNOLOGY AND INFRASTRUCTURE

The company's primary servers are in Singapore through Certria.

Swervy engages with Certria for their data management, hosting and communication services. Certria is a neutral entity that provides complete end-to-end compliance, supervisory and risk mitigation services for eBusiness and media entertainment services in regulated jurisdictions around the world.

The professionals at Certria have over 20 years of experience dealing with the intricacies of licensing, compliance, technical services, corporate setups and all other required supporting services in key jurisdictions worldwide. Certria provides access to trusted services and relationships with all required parties in the eBusiness and media entertainment service landscape, allowing you to grow your business in a trusted network of frontline partners and suppliers.



Online Gaming Services

Certria can assist its clientele with the application of Online Gambling Licenses amongst multiple jurisdiction such as Curaçao, the UK, Gibraltar, the Isle Man, Cyprus and Malta, including support and consultancy services.

Our team holds the necessary skills to manage and guide your business through the licensing process from start to finish.



Data Compliance, Storage & Reporting

Through our in-house private cloud compliance network, we simplify reporting and data processing for licensing and tax perspectives. We can also assist in planning and housing critical data in our own developed private cloud infrastructure.



X509 Certificates – Managed Service

Certia acts as a Reseller of SSL, S/MIME and Code signing Certificates from some of the top providers in the industry. We work together with our clientele and drive the issuance process to minimize the effort on your side.

14. TREASURY SERVICES

As a licensed entity accepting and processing money from players, Swervy has treasury services to ensure the organisation protects players and their funds at all times.

Once the customers have registered a player account they can set a limit on deposits made. The functionality allows for the following options:

- a daily limit;
- a weekly limit; or
- a monthly limit.

Here is an overview of the various limits that are available to the players:

- Limits on Deposits - (daily, weekly, monthly)
- Self-exclusion, permanent or for a specific period of time of a minimum of 6 months,

Customers that set a permanent or temporary self-exclusion will not have their accounts automatically re-opened on the expiry of the exclusion period. Moreover, all marketing communication is switched off for all self-excluded player accounts.

In addition to the above, Swervy's treasury services will make sure that:

- Rules relating to the distribution of winnings are clear;
- Gambling can only occur once funds have been received or guaranteed to be received from an approved financial institution/card issuer;
- Players have a way to determine that their winnings have been paid;
- Where charges are likely to be incurred by Swervy or a third-party, the player will be able to see that these charges are likely and how they are calculated;
- Comprehensive logs of all financial transactions are backed up at least daily and retained for at least 6 years; and,
- All treasury data is stored securely.

15. TRANSACTION RECORDING

All player data and financial transactions are updated in real-time and are governed appropriately. Swervy captures all available information around financial transactions, including IP address and browser information. This data will be held indefinitely. The security of this data will be enforced both at the network level through firewalls, and through the application level via user authentication. The database will record the following information for each player:

- User ID;
- Email;
- First name;
- Last name;
- Registered address;
- Mobile number;
- Deposit amount;
- Number of deposits;
- Withdrawal amount;
- Number Of withdrawals;
- Customers Balance;
- Customer Pending Balance;
- Product Information:
 - Time the game began;
 - Balance at the start of the game;
 - Bets placed by the customer (time-stamped);
 - The game status (in progress, completed, error, etc);
 - The result of the game (time-stamped);
 - The time the game ended;
 - Amount won or lost by the customer;
 - The balance on the customer's account at the end of the game.
- Profit & Loss:
- Transaction history;
- Yield;
- Status of the Latest IP; and
- The currency or currencies utilized by the customer.

It will be possible at all times to generate a complete financial history of a customer's account from its start date. This history will include:

1.1 Balances

- Pending;
- Balance.

1.2 Casino Stake

- Number of games;
- Number of stakes;
- Average stake;
- Highest stake;
- Profit/Loss:

- Turnover;
- Pay-outs;

1.3 Total

- Deposit;
- Net Deposit;
- Staked;
- Gross Pay-outs;
- Withdrawals;
- Pending withdrawals;
- Number of deposits;
- Number of withdrawals;
- Average deposit amount;
- Unsuccessful deposits;
- Unsuccessful withdrawals;
- Profit & Loss.

All deposit and withdrawal attempts will be logged, even if they are unsuccessful.

16. FINANCIAL FORECAST

Swervy's 3 year financial projections as follows:

Swervy International

	<u>Year 1</u>	<u>Year 2</u>	<u>Year 3</u>
Net Turnover (NGR less bonuses)	6,062,859	6,184,116	6,307,799
<u>Operational Expenses</u>			
Hosting Fees	48,772	49,748	50,742
Gaming Platform Fees	1,564,867	1,596,164	1,628,087
Gaming Network Costs	2,876,952	2,934,492	2,993,181
Gaming Management Fees	1,298,178	1,324,141	1,350,624
Hardware Maintenance Costs	39,134	39,917	40,715
Software Costs	47,640	48,593	49,565
License fee	57,550	52,950	52,950
Professional Fees	49,231	50,215	51,220
Travel Cost	4,964	5,064	5,165
Other Operating expenses	38,474	39,243	40,028
Chargebacks	7,240	7,385	7,533
TOTAL COST	6,033,003	6,147,912	6,269,811
Net Profit	29,856	36,205	37,988

Assumptions

Existing business with mature market

Forecasted growth based on 2023 actual results ~2%

17. CUSTOMER SUPPORT AND CUSTOMER COMPLAINTS HANDLING

Swervy has a customer support service which is available 7 days a week 24/7. All complaints will be logged and made available to supervisors to ensure that they are dealt with accordingly.

What tools will be used to provide support to users?

- FAQ;
- Contact- Email;
- Contact – Chat;
- Betting rules;
- Terms and conditions;
- Promotional Terms & Conditions
- Complaints procedure; and,
- Privacy policy.

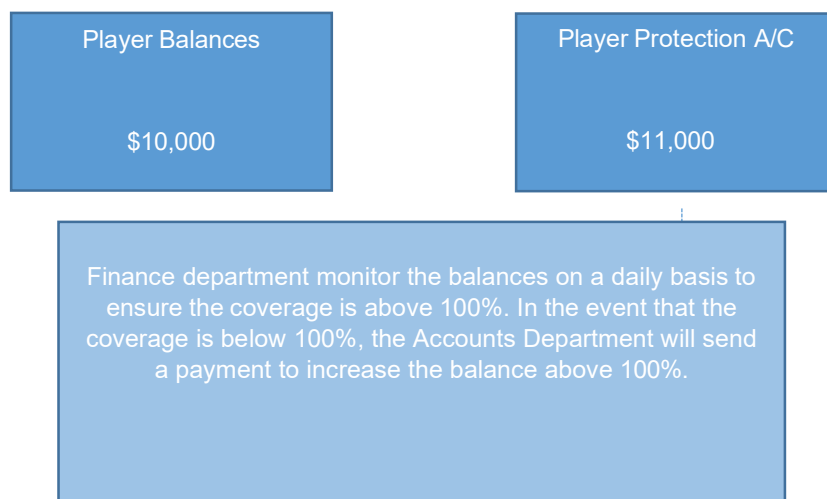
Who will be responsible for customer support?

Swervy customer support will be operated by Verpakt Management. The support services will be available 24 hours, 7 days a week. Swervy will provide a team of dedicated customer support agents who will manage the complaints of customers in a timely manner. All members of the support team will be fully trained to ensure compliance with regulatory obligations, particularly in relation to AML/CFT and responsible gambling.

18. PLAYER PROTECTION

Swervy understands its obligations to have a system in place that ensures the full protection of any player funds, at all times. Players' money is classed as deposits plus winnings plus any bonuses that have been earned. Player funds will be fully protected which will always hold money to the sum of what is available to all players within their accounts.

Example – Ring Fenced Model



In order to ensure that the sum of money available to players within the gaming accounts is protected at all times, the Company will monitor the total player balance daily. The daily player balance will be compared to the funds available in the bank account to ensure that there is sufficient coverage.

19. PROBLEM GAMBLING

Swervy acknowledges the potential risks that online gambling can present and is committed to ongoing improvements to make gambling safe, enjoyable and to not be a cause of harm. Whilst online gambling is fun and entertaining, Swervy understands that it can also be addictive which can be a danger to participants. As such, of key importance to the Company is putting in place mechanisms to actively prevent problem gambling.

Responsible Gambling Controls

In order for the relevant departments and teams to ensure Responsible Gaming the company has put considerable effort into developing tools that allow customers to regulate their gambling by setting limits and self exclusions to either manage or terminate their use of the Swervy website's.

Customers must confirm that they are of legal age upon registration stage and accept the following statement: 'I accept Swervy International B.V. Terms and Conditions. I have read and understood Swervy International B.V. Privacy Policy & Cookie Policy as published on the site and confirm I am 18 years of age or over'.

Reports and Triggers

Our reporting system focuses on various indicators of harm such as High Risk Deposit Amounts, Increase in Deposits, Increase of Stakes and/or Losses, Overnight and/or Long Lasting Game play sessions.

- Reports on deposits within 24 hours
- Reports on failed deposits due to insufficient funds
- Reports on player gaming activity (stakes)
- Reports on losses
- Reports on players with limits in place

Reports on the number of different payments methods used by the player.

Protecting Minors

Swervy will be providing the following information:

- an icon which indicates that underage gaming is not permissible

- The following will be stated on the website and/or the Terms and Conditions

Over 18s only

It is an offence for anyone under the age of 18 to open an account or to gamble with Swervy. We carry out age-verification checks to ensure that all our players are of legal age.

PLEASE NOTE THAT ANYONE UNDER THE AGE OF 18 YEARS OLD
FOUND TO BE USING THIS SITE WILL HAVE ANY WINNINGS
FORFEITED AND ACCOUNT CLOSED

Players with minors in the house that use the Internet are advised to set up parental controls in their operating system or install specialist software. There are a number of third party applications available that parents or guardians can use to monitor or restrict the use of their computer's access to the Internet. These include:

- Net Nanny filtering software protects children from inappropriate web content:

www.netnanny.com

CYBERSitter filtering software allowing parents to add their own sites to block:

www.cybersitter.com

Furthermore, there are responsible gambling messages displayed on the website such as "Gambling can be addictive. Please play responsibly" that are linked with our dedicated Responsible Gaming page that informs the customer about the possible risks and the strategies that could be employed to make gambling an enjoyable experience. Other useful info/tools to practice Responsible Gaming, for example info on how to gamble responsibly, a self-assessment, information for concerned third parties with the behaviour of their loved ones, indicators of when gambling can be considered an issue and what to do in those circumstances, information on support organisations and tools to blocking gambling sites.

How to Protect the Vulnerable Customers

One of our biggest priorities is to provide our Services for entertainment. In cases where our team notices that this is no longer the case for a customer, action is taken to protect the vulnerable person and their family and close environment.

The customer is contacted from our side via our established communication channels and is asked how he or she feels: if gambling has affected his/her life in any way; if personal commitments are neglected and deadlines missed; if the customer is having financial difficulties or struggling with payments and expenses in general, etc.

20. TECHNICAL CHECKS ON GAMES OFFERED

Swervy will engage with a range of third-party providers for the supply of gaming content. All the games provided will be certified by an approved testing house.

21. ANTI-MONEY LAUNDERING

Swervy have adopted an AML/CFT procedures manual which sets out the controls in place to ensure that the Company meets its obligations as per the regulations.