

# **NewEra Information Technology N.V.**

## **Business Plan**

V3.0

Jan. 2024

## **Business Overview**

**NewEra Information Technology N.V.** is poised to become a leading online casino platform in the Brazilian and LATAM markets. Our operational expertise, led by the seasoned entrepreneur TK Chiang, is underpinned by successful brands like WaleBet and the upcoming LuckyA. Leveraging the robust turnkey solutions of SoftSwiss and Digitain, we offer a diverse array of popular and compliant gaming options, tailored to meet local market demands.

### **Strategic Objectives:**

Our primary objective is to establish a strong market presence in our target regions, focusing on customer-centric services, technological innovation, and regulatory compliance. Our growth strategy includes expanding our game portfolio, enhancing user experience, and implementing effective marketing campaigns, both online and offline.

### **Market Analysis:**

Our in-depth analysis of the Brazilian and LATAM markets reveals significant growth potential. We aim to capitalize on this by understanding and catering to local preferences, which is key to our market penetration and customer retention strategies.

### **Operational Excellence:**

We maintain a high standard of operational efficiency, evident in our choice of platform providers, our commitment to risk management, and our robust legal and governance frameworks. Our management team, with diverse expertise, ensures operational excellence and adherence to industry best practices.

### **Marketing and Sales Strategy:**

Our comprehensive marketing strategy encompasses digital and offline channels, focusing on brand visibility and customer engagement. We plan to leverage social media, influencer partnerships, and sponsorships to enhance our market presence.

### **Financial Projections:**

Our financial forecasts show promising growth, with a clear plan to reach €24,000,000 in monthly total deposits by the end of year three. Prudent financial management, coupled with strategic investments in marketing and technology, underpins our financial health.

### **Corporate Responsibility:**

We are committed to sustainable practices and corporate responsibility, promoting responsible gaming, and engaging in initiatives that contribute positively to societal well-being.

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

At **NewEra Information Technology N.V.**, our expertise in operating successful online casino platforms is spearheaded by our distinguished UBO, TK Chiang. Chiang's extensive experience in world-class IT companies, including Sun Microsystems and Dell, has been pivotal in shaping our technological infrastructure. His entrepreneurial journey is marked by notable stints as an executive in IT and gaming companies, further solidifying his reputation as a successful serial entrepreneur.

Under Chiang's leadership, our current brand, WaleBet, and our soon-to-be-launched brand, LuckyA, are setting new benchmarks in the online gaming industry. These platforms are powered by the industry's leading turnkey systems and offer a wide range of fair and popular games, sourced from reputable game developers. With a keen focus on the Brazilian and LATAM markets, we specialize in providing localized services, integrating the most trusted and efficient payment channels to ensure secure and prompt transactions.

Our team's in-depth understanding of the local market, combined with our technological prowess and Chiang's visionary leadership, enables us to offer a gaming experience that is high-quality, instant, and closely aligned with the cultural nuances of our target audience. This unique blend of expertise and market insight positions us at the forefront of the competitive online casino industry.

## Section 2: Company Management Structure

**CEO: TK Chiang**

**Finance Manager: Andressa Alves**

**Marketing Manager: Érika Rodrigues**

**Operating Manager: Leonardo Moura**

**MLRO: Marcos Galvão**

**Customer Service/Product Manager: Felliipe Pereira**

IT Manager: To Be Hired (TBH)

At the helm of our management team is CEO TK Chiang, a seasoned leader with a rich background in IT and gaming industries. His expertise, garnered from top-tier IT companies and a successful entrepreneurial career, guides our strategic vision and operational excellence.

Our Finance Manager, Andressa Alves, oversees our financial operations, ensuring robust and transparent financial practices. She plays a critical role in driving the financial health and sustainability of our business.

The Marketing Manager, Érika Rodrigues, leads our marketing initiatives. Her expertise is pivotal in developing and implementing marketing strategies that resonate with our target markets, enhancing our brand visibility and customer engagement.

Leonardo Moura, our Operating Manager, ensures smooth operational workflows. His oversight is crucial in maintaining operational efficiency and effectiveness, directly contributing to our overall success.

Marcos Galvão, serving as our MLRO (Money Laundering Reporting Officer), is responsible for overseeing our compliance with anti-money laundering regulations. His role is instrumental in maintaining the integrity and legality of our financial transactions.

Our Customer Service Manager, Fellipe Pereira, heads our customer service team. His expertise and leadership ensure that we provide top-tier support, fostering positive customer experiences and loyalty.

Additional key management roles, essential to our operation, are currently in the process of being filled. These positions will further strengthen our management team and enhance our organizational capacity.

### Section 3: Business Forecasts for 3 Years

As we venture into the competitive landscape of online casino gaming, a thorough financial forecast is crucial to map out our path to success. The following three-year financial projection underscores our strategic planning, operational efficiency, and financial prudence. It lays out our expected performance in key financial metrics, setting realistic and achievable targets.

**1. Revenue Growth:** A consistent increase in monthly total deposits, culminating in the achievement of our target of €24,000,000 by the end of the third year.

**2. Customer Base Expansion:** An increase in the number of first-time depositors (FTDs) and active players, reflecting successful market penetration and customer retention strategies.

**3. Financial Stability:** Balanced growth in total bets and wins, ensuring a stable financial environment and sustainable profitability.

**4. Operational Efficiency:** Careful management of operational expenses, aligning with our revenue growth to maximize profitability.

| 1ST YEAR PROJECTIONS                      | Month 1   | Month 2   | Month 3    | Month 4    | Month 5    | Month 6    | Month 7    | Month 8    | Month 9    | Month 10   | Month 11   | Month 12   |
|-------------------------------------------|-----------|-----------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| Number of FTDs                            | 2,500     | 5,000     | 9,000      | 12,000     | 15,000     | 18,000     | 23,000     | 25,429     | 28,768     | 32,107     | 35,446     | 38,786     |
| Number of Depositing Players (incl. FTDs) | 2,500     | 5,500     | 10,350     | 14,745     | 19,259     | 24,119     | 31,004     | 35,742     | 41,185     | 46,675     | 52,237     | 57,747     |
| Total Deposits, EUR                       | 300,000   | 660,000   | 1,293,750  | 1,916,850  | 2,599,965  | 3,376,632  | 4,650,662  | 5,361,230  | 6,177,824  | 7,001,183  | 7,835,578  | 8,662,044  |
| Total Withdrawals, EUR                    | 210,000   | 462,000   | 905,625    | 1,341,795  | 1,819,976  | 2,363,642  | 3,255,463  | 3,752,861  | 4,324,477  | 4,900,828  | 5,484,905  | 6,063,431  |
| Total Bets                                | 3,157,895 | 6,875,000 | 13,337,629 | 19,559,694 | 26,262,273 | 34,107,394 | 46,976,379 | 54,153,839 | 62,402,265 | 70,719,024 | 79,147,252 | 87,495,392 |
| Total Wins                                | 3,047,368 | 6,634,375 | 12,870,812 | 18,875,105 | 25,343,093 | 32,913,635 | 45,332,206 | 52,258,454 | 60,218,186 | 68,243,858 | 76,377,098 | 84,433,053 |
| GGR                                       | 110,526   | 240,625   | 466,817    | 684,589    | 919,180    | 1,193,759  | 1,644,173  | 1,895,384  | 2,184,079  | 2,475,166  | 2,770,154  | 3,062,339  |
| Bonuses                                   | 38,684    | 84,219    | 158,718    | 225,914    | 294,137    | 370,065    | 509,694    | 587,569    | 677,065    | 767,301    | 858,748    | 949,325    |
| Game Providers Fee                        | 14,368    | 31,281    | 60,686     | 88,997     | 119,493    | 155,189    | 213,743    | 246,400    | 283,930    | 321,772    | 360,120    | 398,104    |
| Payment Processors Fee                    | 35700     | 78,540    | 153,956    | 228,105    | 309,396    | 401,819    | 553,429    | 637,986    | 735,161    | 833,141    | 932,434    | 1,030,783  |
| Platform Fee (10%)                        | 11,053    | 24,063    | 46,682     | 68,459     | 91,918     | 119,376    | 164,417    | 189,538    | 218,408    | 247,517    | 277,015    | 306,234    |
| Affiliate Payments & User Acquisition     | 50,000    | 80,000    | 200,000    | 200,000    | 200,000    | 250,000    | 250,000    | 310,000    | 343,571    | 377,143    | 410,714    | 444,286    |
| CPA per player                            | 20        | 16        | 22         | 17         | 13         | 14         | 11         | 12         | 12         | 12         | 12         | 11         |
| Other Operating Expenses                  | 20,000    | 20,000    | 30,000     | 30,000     | 40,000     | 50,000     | 60,000     | 62,857     | 69,643     | 76,429     | 83,214     | 90,000     |
| Net Monthly Result                        | -59,279   | -77,478   | -183,225   | -156,886   | -135,765   | -152,690   | -107,109   | -138,967   | -143,699   | -148,136   | -152,092   | -156,393   |

  

| 2ND YEAR PROJECTIONS                      | Month 13    | Month 14    | Month 15    | Month 16    | Month 17    | Month 18    | Month 19    | Month 20    | Month 21    | Month 22    | Month 23    | Month 24    |
|-------------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Number of FTDs                            | 40,000      | 41,500      | 43,000      | 44,500      | 46,000      | 47,500      | 48,500      | 49,500      | 50,000      | 50,500      | 51,000      | 51,000      |
| Number of Depositing Players (incl. FTDs) | 68,066      | 73,691      | 78,864      | 83,602      | 88,029      | 92,041      | 95,346      | 98,365      | 100,658     | 102,649     | 104,397     | 105,468     |
| Total Deposits, EUR                       | 10,550,161  | 11,422,126  | 12,223,956  | 12,958,360  | 13,644,462  | 14,266,392  | 15,255,364  | 15,738,418  | 16,105,267  | 16,423,838  | 16,703,591  | 16,874,816  |
| Total Withdrawals, EUR                    | 7,385,113   | 7,995,488   | 8,556,769   | 9,070,852   | 9,551,123   | 9,986,475   | 10,678,755  | 11,016,892  | 11,273,687  | 11,496,687  | 11,692,514  | 11,812,371  |
| Total Bets                                | 111,054,329 | 118,980,479 | 126,020,167 | 132,228,161 | 137,822,844 | 144,104,971 | 154,094,586 | 158,973,917 | 162,679,466 | 165,897,359 | 168,723,145 | 170,452,686 |
| Total Wins                                | 107,167,428 | 114,816,163 | 121,609,461 | 127,600,175 | 132,999,044 | 139,061,297 | 148,701,275 | 153,409,830 | 156,985,685 | 160,090,951 | 162,817,835 | 164,486,842 |
| GGR                                       | 3,886,902   | 4,164,317   | 4,410,706   | 4,627,986   | 4,823,800   | 5,043,674   | 5,393,310   | 5,564,087   | 5,693,781   | 5,806,408   | 5,905,310   | 5,965,844   |
| Bonuses                                   | 1,360,416   | 1,457,511   | 1,499,640   | 1,527,235   | 1,543,616   | 1,563,539   | 1,671,926   | 1,724,867   | 1,765,072   | 1,799,986   | 1,830,646   | 1,849,412   |
| Game Providers Fee                        | 505,297     | 541,361     | 573,392     | 601,638     | 627,094     | 655,678     | 701,130     | 723,331     | 740,192     | 754,833     | 767,690     | 775,560     |
| Payment Processors Fee                    | 1255469.2   | 1,359,233   | 1,454,651   | 1,542,045   | 1,623,691   | 1,697,701   | 1,815,388   | 1,872,872   | 1,916,527   | 1,954,437   | 1,987,727   | 2,008,103   |
| Platform Fee (10%)                        | 388,690     | 416,432     | 441,071     | 462,799     | 482,380     | 504,367     | 539,331     | 556,409     | 569,378     | 580,641     | 590,531     | 596,584     |
| Affiliate Payments & User Acquisition     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     |
| CPA per player                            | 11          | 11          | 10          | 10          | 10          | 9           | 9           | 9           | 9           | 9           | 9           | 9           |
| Other Operating Expenses                  | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      |
| Net Monthly Result                        | -152,971    | -140,220    | -88,047     | -35,731     | 17,019      | 92,389      | 135,535     | 156,608     | 172,613     | 186,511     | 198,715     | 206,185     |

  

| 3RD YEAR PROJECTIONS                      | Month 25    | Month 26    | Month 27    | Month 28    | Month 29    | Month 30    | Month 31    | Month 32    | Month 33    | Month 34    | Month 35    | Month 36    |
|-------------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Number of FTDs                            | 51,000      | 51,500      | 52,000      | 52,500      | 53,000      | 53,500      | 54,000      | 54,500      | 55,000      | 55,500      | 56,000      | 55,000      |
| Number of Depositing Players (incl. FTDs) | 110,403     | 112,634     | 114,705     | 119,937     | 122,748     | 129,940     | 133,648     | 137,180     | 140,281     | 143,231     | 145,765     | 146,598     |
| Total Deposits, EUR                       | 17,664,488  | 18,021,491  | 18,352,855  | 19,189,965  | 19,639,724  | 21,440,019  | 22,051,905  | 22,634,755  | 23,146,354  | 23,633,127  | 24,051,247  | 24,188,728  |
| Total Withdrawals, EUR                    | 12,365,142  | 12,615,044  | 12,846,998  | 13,432,976  | 13,747,807  | 15,008,013  | 15,436,333  | 15,844,329  | 16,202,447  | 16,543,189  | 16,835,873  | 16,932,109  |
| Total Bets                                | 178,429,174 | 182,035,263 | 185,382,371 | 193,838,033 | 198,381,053 | 216,565,847 | 222,746,513 | 228,633,893 | 233,801,551 | 238,718,454 | 242,941,890 | 244,330,584 |
| Total Wins                                | 172,184,153 | 175,664,028 | 178,893,988 | 187,053,702 | 191,437,717 | 208,986,042 | 214,950,385 | 220,631,707 | 225,618,496 | 230,363,308 | 234,438,924 | 235,779,014 |
| GGR                                       | 6,245,021   | 6,371,234   | 6,488,383   | 6,784,331   | 6,943,337   | 7,579,805   | 7,796,128   | 8,002,186   | 8,183,054   | 8,355,146   | 8,502,966   | 8,551,570   |
| Bonuses                                   | 1,873,506   | 1,911,370   | 1,946,515   | 2,035,299   | 2,083,001   | 2,273,941   | 2,338,838   | 2,400,656   | 2,454,916   | 2,506,544   | 2,550,890   | 2,565,471   |
| Game Providers Fee                        | 811,853     | 828,260     | 843,490     | 881,963     | 902,634     | 985,375     | 1,013,497   | 1,040,284   | 1,063,797   | 1,086,169   | 1,105,386   | 1,111,704   |
| Payment Processors Fee                    | 2,102,074   | 2,144,557   | 2,183,990   | 2,283,606   | 2,337,127   | 2,551,362   | 2,624,177   | 2,693,536   | 2,754,416   | 2,812,342   | 2,862,098   | 2,878,459   |
| Platform Fee (10%)                        | 624,502     | 637,123     | 648,838     | 678,433     | 694,334     | 757,980     | 779,613     | 800,219     | 818,305     | 835,515     | 850,297     | 855,157     |
| Affiliate Payments & User Acquisition     | 450,000     | 460,000     | 470,000     | 480,000     | 490,000     | 500,000     | 510,000     | 520,000     | 530,000     | 540,000     | 550,000     | 560,000     |
| CPA per player                            | 9           | 9           | 9           | 9           | 9           | 9           | 9           | 10          | 10          | 10          | 10          | 10          |
| Other Operating Expenses                  | 95,000      | 95,000      | 95,000      | 96,000      | 96,000      | 96,000      | 96,000      | 97,000      | 97,000      | 98,000      | 99,000      | 100,000     |
| Net Monthly Result                        | 288,086     | 294,923     | 300,550     | 329,030     | 340,241     | 415,146     | 434,003     | 450,492     | 464,619     | 476,576     | 485,296     | 480,779     |

#### Summary:

These projections are based on a combination of market analysis, historical data, and strategic planning, reflecting our confidence in the scalability and potential of our business model.

## Section 4: Strategy for Business Growth

This strategy outlines our comprehensive approach to achieving sustainable growth and market leadership. We emphasize a blend of market intelligence, localized services, innovative marketing strategies, and a strong commitment to responsible gaming and regulatory compliance.

### 1. Market Intelligence and Game Selection:

- **Experienced Operational Team:** WaleBet's operational team brings a wealth of experience and a proven track record in the online casino industry. This experience is critical in maintaining a keen understanding of market trends and player preferences.
- **Data-Driven Game Analysis:** Regular analysis of player gaming data ensures that we stay ahead of market demands. Our game selection process is guided by this analysis, focusing on internationally certified and compliant game providers to meet market needs.
- **Responsive Game Offerings:** Our platform's agility allows for rapid and flexible adjustments to the game portfolio, ensuring that we always offer the most relevant and engaging content to our players.

### 2. Localized Service and Training:

- **Local Expertise:** We employ experienced local service, management, and operational teams, providing us with vital insights into the cultural and market-specific nuances of our target regions.
- **Comprehensive Training Systems:** A robust training program is in place to continuously develop our staff, ensuring excellence in service and operations.

### 3. Marketing and Brand Visibility:

- **Digital Marketing:** Leveraging online channels such as social media (Facebook, Instagram, TikTok), influencer partnerships, sports websites, and Google AdSense to enhance our digital footprint and engage with our audience.
- **Offline Marketing:** Implementing offline marketing strategies, including Out-of-Home (OOH) advertising and sponsorships of sports teams and players, to increase brand visibility and market penetration.

### 4. Product Innovation and Technological Advancements:

- **Game Portfolio Expansion:** Constantly updating our game offerings to include the latest and most popular titles, ensuring a varied and engaging gaming experience.
- **Technological Enhancements:** Investing in state-of-the-art technology to enhance user experience, including mobile compatibility and user-friendly interfaces.

### 5. Compliance and Responsible Gaming:

- **Regulatory Adherence:** Strict compliance with gaming regulations to maintain operational legality and uphold our reputation in the industry.
- **Promoting Responsible Gaming:** Implementing and advocating responsible gaming practices to protect our users and align with industry standards.

## **6. Integrated Marketing Strategy:**

- **Online and Offline Synergy:** Combining online and offline marketing efforts to create a cohesive and comprehensive marketing strategy that maximizes our reach and impact in the market.
- **Community Engagement:** Engaging with our community through various platforms to build a loyal customer base and foster a positive brand image.

## **Section 5: Key Suppliers and Material Dependencies**

### **1. System Platform Providers:**

- **SoftSwiss and Digitain as Turnkey Solution Providers:** Our online casino operations are powered by SoftSwiss and Digitain, industry leaders in providing comprehensive turnkey solutions. These partnerships are central to our business model, offering robust and scalable platforms that are essential for our operation.
- **Advantages of SoftSwiss and Digitain:** Both providers are renowned for their reliability, advanced technology, and a wide range of integrated services. Their platforms support a vast array of games, ensuring we offer a diverse and engaging gaming experience to our customers.

### **2. Game Aggregation and Integration:**

- **Extensive Game Portfolio:** SoftSwiss and Digitain provide game aggregation services, allowing us to access a large and varied portfolio of games. This integration ensures we consistently deliver fresh and popular content to our players.
- **Seamless Integration Process:** Their platforms facilitate seamless integration of new games, enabling us to swiftly adapt to market trends and player preferences.

### **3. Risk Management and Regulatory Compliance:**

- **Industry-Standard Risk Controls:** Both platforms come equipped with risk management tools that meet industry standards and regulatory requirements. These tools are crucial for monitoring and mitigating risks associated with online gaming.
- **Compliance with Regulations:** The backend systems provided by SoftSwiss and Digitain ensure compliance with the legal and regulatory frameworks of our target markets. This compliance is vital for maintaining our operational integrity and customer trust.

### **4. Operational Reliability and Efficiency:**

- **System Stability and Uptime:** Reliability is paramount in online gaming. Our providers ensure high system stability and uptime, minimizing disruptions and maintaining a smooth gaming experience for users.

- **Technical Support and Maintenance:** Both SoftSwiss and Digitain provide ongoing technical support and maintenance, ensuring that any issues are promptly addressed and system updates are seamlessly implemented.

## **5. Future-Proofing and Scalability:**

- **Adapting to Market Evolution:** The flexibility and scalability of our platform providers allow us to adapt to the evolving online gaming landscape. This adaptability is key to our long-term growth and market relevance.
- **Potential for New Features and Innovations:** As the industry evolves, SoftSwiss and Digitain are well-positioned to integrate new features and innovations, keeping our offerings at the forefront of technological advancements.

In conclusion, our collaboration with SoftSwiss and Digitain is the platform cornerstone of our business strategy. Their comprehensive solutions not only ensure operational excellence but also provide us with the agility and reliability needed to thrive in the competitive online casino market.

## **Section 6: Risk Evaluation and Management**

This section outlines our comprehensive approach to managing the various risks associated with operating an online casino. Our commitment to robust risk management is fundamental to maintaining operational integrity, customer trust, and regulatory compliance.

### **1. Risk Identification and Assessment:**

- **Continuous Risk Monitoring:** Implementing a robust system for the continuous monitoring and identification of potential risks, including operational, financial, compliance, and reputational risks.
- **Risk Assessment Framework:** Developing a comprehensive framework to assess the severity and probability of identified risks, enabling prioritized risk management.

### **2. Risk Mitigation Strategies:**

- **Operational Risk Management:** Regularly updating and testing our operational procedures to ensure system integrity, data security, and customer protection.
- **Financial Risk Controls:** Implementing stringent financial controls, including anti-fraud measures, to protect against financial crimes and ensure the financial stability of the operation.

### **3. Compliance and Regulatory Risks:**

- **Adherence to Regulations:** Ensuring full compliance with all applicable gaming laws and regulations in our target markets. This includes adhering to anti-money laundering (AML) laws, know your customer (KYC) policies, and responsible gaming practices.
- **Regular Compliance Audits:** Conducting frequent audits to ensure ongoing compliance and to identify areas requiring improvement.

#### **4. Technological and Cybersecurity Risks:**

- **Data Protection and Privacy:** Employing advanced cybersecurity measures to protect sensitive customer data and comply with data protection regulations.
- **System Redundancy and Disaster Recovery:** Establishing robust system redundancy and disaster recovery protocols to minimize downtime and protect against data loss.

#### **5. Stakeholder Communication and Reporting:**

- **Transparent Reporting:** Establishing clear channels for reporting risks to relevant stakeholders, including management, the board of directors, and regulatory authorities as appropriate.
- **Employee Training and Awareness:** Providing regular training to employees on risk awareness, identification, and the proper protocols for reporting and managing risks.

#### **6. Establishment of Risk Management Committee:**

- **Dedicated Committee:** Forming a Risk Management Committee responsible for overseeing the implementation of risk management policies, reviewing their effectiveness, and making recommendations for improvements.

#### **7. Periodic Review and Adaptation:**

- **Regular Policy Reviews:** Conducting periodic reviews of risk management policies and strategies to ensure they remain effective and relevant to the current operating environment.
- **Adaptation to Emerging Risks:** Remaining agile to adapt to new and emerging risks in the online casino industry, including changes in market conditions, player behaviors, and technological advancements.

### **Section 7: Legal and Governance Framework**

This section elaborates on the integral aspects of our governance structure, emphasizing the board's role, its interaction with management, and the decision-making framework. It also outlines the legal support structure and board meeting practices, ensuring transparency and accountability in our operations.

### **1. Board Oversight and Membership:**

- Board Composition: Establishment of a Board of Directors with a diverse range of expertise in gaming, legal, financial, and technological fields to provide strategic oversight.
- Role in Strategic Oversight: The board's primary role is to provide strategic oversight, ensuring the company's long-term viability and adherence to legal and ethical standards.

### **2. Interaction with Senior Management:**

- Day-to-Day Decision Making: Senior management, led by the CEO, is responsible for day-to-day operational decisions. The board, however, plays a crucial role in guiding these decisions by setting overarching policies and strategies.
- Regular Reporting and Communication: Senior management regularly reports to the board on operational progress, financial performance, and strategic initiatives.

### **3. Board/UBO Decision-Making Authority:**

- Reserved Matters for the Board/UBOs: Certain critical matters are reserved for the board or Ultimate Beneficial Owners (UBOs), including major financial decisions, mergers and acquisitions, and changes to corporate policies.
- Preventing Deadlocks: The governance structure is designed to prevent deadlocks. This is achieved through clear voting procedures and, in some cases, tie-breaking mechanisms involving UBOs or an independent board member.

### **4. Board Meeting Practices:**

- Frequency and Attendance: Board meetings are held quarterly, with additional meetings convened for urgent matters. Besides board members, senior management representatives, including the CEO, CFO, and Legal Counsel, are typically invited to attend.
- Invitation Policy: Depending on the agenda, experts or advisors may be invited for specific topics. This policy ensures that discussions are informed and comprehensive.
- Meeting Documentation: All meetings are meticulously documented, with minutes and action items circulated among board members and relevant stakeholders.

### **5. Legal Support and Advice:**

- Legal Team: Employing a dedicated legal team to oversee all aspects of legal compliance, including gaming licenses, contracts, intellectual property rights, labor laws, and day-to-day legal matters, ensuring compliance with relevant laws and regulations.
- External Legal Counsel: For specialized matters, we engage external legal counsel to provide expert advice and support.

## **6. Governance and Compliance Monitoring:**

- **Licensing Requirements:** Strict adherence to all licensing requirements set forth by regulatory authorities, including Curacao's gaming control board.
- **Regular Legal Audits:** Conducting regular legal audits to identify potential legal risks and ensure ongoing compliance with local and international laws.
- **Regular Reporting and Communication with Regulators:** Establishing consistent and transparent communication channels with regulatory bodies for regular reporting and information exchange.
- **Audit and Compliance Committees:** These committees regularly review the company's adherence to governance practices and legal compliance, reporting their findings to the board.

This section outlines our commitment to maintaining a robust legal and governance framework, ensuring that our online casino operates with integrity, transparency, and in full compliance with legal and regulatory standards.

## **Section 8: Target KPIs and Business Objectives**

This section outlines our approach to measuring success through a set of clearly defined KPIs and describes our long-term objectives. Our focus on financial performance, customer engagement, operational efficiency, and compliance underpins our strategic direction towards sustainable growth and market leadership.

### **1. Key Performance Indicators (KPIs):**

- **Financial Performance:** Revenue growth, profit margins, and cash flow stability are primary financial KPIs. We also monitor customer lifetime value (LTV) and the cost of customer acquisition (CAC) to gauge financial health.
- **Customer Engagement and Retention:** Metrics such as active users, session duration, and repeat engagement rates. Customer retention rates are crucial for understanding player loyalty and satisfaction.
- **Operational Efficiency:** KPIs include system uptime, support ticket resolution time, and operational cost ratios. These indicators help assess the efficiency of our operational processes.
- **Compliance and Risk Management:** Regular audits and compliance check metrics ensure adherence to regulatory standards and effective risk management.

### **2. Long-term Business Objectives:**

- **Market Expansion:** Expanding our presence in the Brazilian and LATAM markets, with goals to establish a significant market share and brand recognition in these regions within the next 5 years.
- **Product Diversification:** Continuously evolving our game offerings and exploring additional online gaming verticals to diversify revenue streams and enhance player experience.
- **Technological Innovation:** Staying at the forefront of technological advancements in online gaming, including mobile gaming and interactive features, to enhance user experience and operational efficiency.

- Sustainable Growth: Aiming for a sustainable growth rate that balances market expansion with financial stability and operational scalability.
- Corporate Responsibility: Upholding high standards of corporate responsibility, including promoting responsible gaming and contributing positively to communities and the environment.

### **3. Strategic Initiatives:**

- Investment in Marketing and Branding: Robust marketing strategies to increase brand visibility and customer acquisition in target markets.
- Customer Experience Enhancement: Focusing on customer service excellence and platform user-friendliness to ensure player satisfaction and retention.
- Partnerships and Collaborations: Forming strategic partnerships to expand our game portfolio and integrate innovative gaming technologies.
- Compliance and Regulatory Alignment: Ensuring ongoing compliance with evolving regulatory landscapes to maintain operational legitimacy and customer trust.

## **Section 9: Policies and Procedures**

Based on a comprehensive understanding of online casino operations and the requirements set forth by gaming control boards, this section of the business plan addresses the creation, implementation, and management of policies and procedures, highlighting our commitment to transparency, due diligence, and expertise. Our approach ensures that we not only meet the regulatory requirements but also uphold the highest standards of operational integrity and efficiency.

### **1. Development and Implementation:**

- Internal vs. External Creation: Our policies and procedures are primarily developed internally, leveraging our team's deep expertise in online gaming operations. For specialized areas like legal compliance and advanced technology, we engage with external experts to ensure comprehensive and up-to-date policies.
- Collaborative Approach: This hybrid approach ensures that we benefit from both internal insights and external expertise, resulting in well-rounded and effective policies.

### **2. Timelines and Communication with GCB:**

- Commitment to Transparency: We are committed to keeping the GCB fully apprised of our progress. Regular updates will be provided, detailing the implementation stages, any challenges encountered, and the measures taken to address them.
- Implementation Timeline: We have established a clear timeline for the implementation of all key policies, with immediate effect for critical compliance and operational procedures. Other policies follow a phased implementation plan, aligning with business milestones.

#### February 1, 2024 - Immediate Implementation:

- Critical Compliance Procedures: Immediate implementation of crucial legal and regulatory compliance procedures, including licensing requirements, anti-money laundering (AML) policies, and know your customer (KYC) protocols.
- Critical Operational Procedures: Deployment of essential operational protocols focusing on data security, customer privacy, and transactional integrity.

#### February 2024:

- Financial Management Policies: Establishing robust financial controls and reporting systems (Week 1 of February).
- Marketing and Customer Acquisition Policies: Formalizing strategies for market penetration and customer retention (Week 2 of February).
- Risk Management Policies: Introducing comprehensive risk assessment and mitigation strategies (Week 3 of February).
- HR and Training Policies: Implementing employee training programs and HR management protocols (Week 4 of February).

#### March 2024:

- Technology and Cybersecurity Policies: Strengthening cybersecurity measures and technological infrastructure (Week 1 of March).
- Legal and Regulatory Compliance Policies: Updating and refining compliance policies as per regulatory changes (Week 2 of March).
- Customer Service Policies: Enhancing customer support frameworks and service standards (Week 3 of March).
- Data Protection and Privacy Policies: Reinforcing data protection measures (Week 4 of March).

#### April 2024:

- Environmental and Social Responsibility Policies: Implementing sustainability practices and social responsibility initiatives (Week 1 of April).
- Corporate Governance Policies: Reviewing and updating governance structures and board responsibilities (Week 2 of April).
- Anti-Money Laundering Policies: Reinforcing AML procedures and compliance (Week 3 of April).
- Responsible Gaming Policies: Enhancing responsible gaming practices and player protection measures (Week 4 of April).

This timeline ensures that all key policies are developed, reviewed, and implemented within a three-month window, aligning with the company's commitment to operational excellence and regulatory compliance. Each policy area will receive focused attention during its assigned week to ensure thorough and effective implementation.

### **3. Qualifications and Competency Assurance:**

- **Board Oversight:** The board, comprising individuals with extensive experience in various relevant fields, oversees the development and implementation of all policies. This oversight ensures that policies are not only robust but also aligned with industry best practices.
- **Expertise and Due Diligence:** When engaging external entities for policy development, we conduct thorough due diligence to confirm their qualifications, competence, and lack of conflict of interest. This includes reviewing their track record, industry reputation, and any potential conflicts that might impact their impartiality.
- **Internal Expertise:** Internally, our team consists of seasoned professionals with comprehensive knowledge of the online casino industry, including operational, financial, legal, and technological aspects. Their expertise is pivotal in developing policies that are realistic, practical, and effective.
- **Continuous Training and Development:** Regular training programs are conducted to ensure that our team stays abreast of the latest industry developments and regulatory changes. This ongoing development is crucial for maintaining the competency and effectiveness of our internal policy-making process.

## **Conclusion**

As we stand at the precipice of launching **NewEra Information Technology N.V.**, a pioneering force in the online casino industry, our comprehensive plan lays a solid foundation for a future marked by sustainable growth, innovation, and industry leadership.

Our plan charts a strategic course through the dynamic waters of the Brazilian and LATAM online gaming markets, underpinned by the rich experience of our leadership, the robustness of our operational strategies, and our unwavering commitment to legal and ethical standards. The careful curation of our gaming offerings, powered by industry leaders SoftSwiss and DigitaIn, positions us not only to meet but exceed the expectations of our diverse clientele.

The financial forecasts paint a picture of a business not just poised for profitability, but also for enduring success. Our emphasis on rigorous financial discipline, combined with aggressive marketing strategies and a steadfast focus on customer experience, sets the stage for us to reach and surpass our ambitious targets.

In an industry where trust and compliance are paramount, our proactive approach to risk management, legal adherence, and corporate governance sets us apart. We have not only established policies and procedures that meet the stringent requirements of regulatory bodies but also embody our commitment to responsible gaming and corporate responsibility.

As we move forward, our eyes are firmly set on the horizon, ready to adapt, innovate, and expand. We are not just launching an online casino; we are setting a new standard for excellence in the online gaming industry. Our business plan is not just a roadmap for our journey; it's a testament to our potential to reshape the gaming landscape.

**NewEra Information Technology N.V.** is more than a business venture; it's a beacon of innovation and integrity in the online casino industry. With our insight and this plan, we invite our stakeholders, including the regulatory bodies, investors, and customers, to join us on this exciting journey to redefine gaming excellence.

| 1ST YEAR PROJECTIONS                      | Month 1 | Month 2 | Month 3   | Month 4   | Month 5   | Month 6   | Month 7   | Month 8   | Month 9   | Month 10  | Month 11  | Month 12  |
|-------------------------------------------|---------|---------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Number of FTDs                            | 2,500   | 5,000   | 9,000     | 12,000    | 15,000    | 18,000    | 23,000    | 25,429    | 28,768    | 32,107    | 35,446    | 38,786    |
| Number of Depositing Players (incl. FTDs) | 2,500   | 5,500   | 10,350    | 14,745    | 19,259    | 24,119    | 31,004    | 35,742    | 41,185    | 46,675    | 52,237    | 57,747    |
| Total Deposits, EUR                       | 300,000 | 660,000 | 1,293,750 | 1,916,850 | 2,599,965 | 3,376,632 | 4,650,662 | 5,361,230 | 6,177,824 | 7,001,183 | 7,835,578 | 8,662,044 |
| Total Withdrawals, EUR                    | 210,000 | 462,000 | 905,625   | 1,341,795 | 1,819,976 | 2,363,642 | 3,255,463 | 3,752,861 | 4,324,477 | 4,900,828 | 5,484,905 | 6,063,431 |

|                                       |           |           |            |            |            |            |            |            |            |            |            |            |
|---------------------------------------|-----------|-----------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| Total Bets                            | 3,157,895 | 6,875,000 | 13,337,629 | 19,559,694 | 26,262,273 | 34,107,394 | 46,976,379 | 54,153,839 | 62,402,265 | 70,719,024 | 79,147,252 | 87,495,392 |
| Total Wins                            | 3,047,368 | 6,634,375 | 12,870,812 | 18,875,105 | 25,343,093 | 32,913,635 | 45,332,206 | 52,258,454 | 60,218,186 | 68,243,858 | 76,377,098 | 84,433,053 |
| GGR                                   | 110,526   | 240,625   | 466,817    | 684,589    | 919,180    | 1,193,759  | 1,644,173  | 1,895,384  | 2,184,079  | 2,475,166  | 2,770,154  | 3,062,339  |
| Bonuses                               | 38,684    | 84,219    | 158,718    | 225,914    | 294,137    | 370,065    | 509,694    | 587,569    | 677,065    | 767,301    | 858,748    | 949,325    |
| Game Providers Fee                    | 14,368    | 31,281    | 60,686     | 88,997     | 119,493    | 155,189    | 213,743    | 246,400    | 283,930    | 321,772    | 360,120    | 398,104    |
| Payment Processors Fee                | 35,700    | 78,540    | 153,956    | 228,105    | 309,396    | 401,819    | 553,429    | 637,986    | 735,161    | 833,141    | 932,434    | 1,030,783  |
| Platform Fee (10%)                    | 11,053    | 24,063    | 46,682     | 68,459     | 91,918     | 119,376    | 164,417    | 189,538    | 218,408    | 247,517    | 277,015    | 306,234    |
| Affiliate Payments & User Acquisition | 50,000    | 80,000    | 200,000    | 200,000    | 200,000    | 250,000    | 250,000    | 310,000    | 343,571    | 377,143    | 410,714    | 444,286    |
| CPA per player                        | 20        | 16        | 22         | 17         | 13         | 14         | 11         | 12         | 12         | 12         | 12         | 11         |
| Other Operating Expenses              | 20,000    | 20,000    | 30,000     | 30,000     | 40,000     | 50,000     | 60,000     | 62,857     | 69,643     | 76,429     | 83,214     | 90,000     |
| Net Monthly Result                    | -59,279   | -77,478   | -183,225   | -156,886   | -135,765   | -152,690   | -107,109   | -138,967   | -143,699   | -148,136   | -152,092   | -156,393   |

| 2ND YEAR PROJECTIONS                      | Month 13   | Month 14   | Month 15   | Month 16   | Month 17   | Month 18   | Month 19   | Month 20   | Month 21   | Month 22   | Month 23   | Month 24   |
|-------------------------------------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| Number of FTDs                            | 40,000     | 41,500     | 43,000     | 44,500     | 46,000     | 47,500     | 48,500     | 49,500     | 50,000     | 50,500     | 51,000     | 51,000     |
| Number of Depositing Players (incl. FTDs) | 68,066     | 73,691     | 78,864     | 83,602     | 88,029     | 92,041     | 95,346     | 98,365     | 100,658    | 102,649    | 104,397    | 105,468    |
| Total Deposits, EUR                       | 10,550,161 | 11,422,126 | 12,223,956 | 12,958,360 | 13,644,462 | 14,266,392 | 15,255,364 | 15,738,418 | 16,105,267 | 16,423,838 | 16,703,591 | 16,874,816 |
| Total Withdrawals, EUR                    | 7,385,113  | 7,995,488  | 8,556,769  | 9,070,852  | 9,551,123  | 9,986,475  | 10,678,755 | 11,016,892 | 11,273,687 | 11,496,687 | 11,692,514 | 11,812,371 |

|                                       |             |             |             |             |             |             |             |             |             |             |             |             |
|---------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Total Bets                            | 111,054,329 | 118,980,479 | 126,020,167 | 132,228,161 | 137,822,844 | 144,104,971 | 154,094,586 | 158,973,917 | 162,679,466 | 165,897,359 | 168,723,145 | 170,452,686 |
| Total Wins                            | 107,167,428 | 114,816,163 | 121,609,461 | 127,600,175 | 132,999,044 | 139,061,297 | 148,701,275 | 153,409,830 | 156,985,685 | 160,090,951 | 162,817,835 | 164,486,842 |
| GGR                                   | 3,886,902   | 4,164,317   | 4,410,706   | 4,627,986   | 4,823,800   | 5,043,674   | 5,393,310   | 5,564,087   | 5,693,781   | 5,806,408   | 5,905,310   | 5,965,844   |
| Bonuses                               | 1,360,416   | 1,457,511   | 1,499,640   | 1,527,235   | 1,543,616   | 1,563,539   | 1,671,926   | 1,724,867   | 1,765,072   | 1,799,986   | 1,830,646   | 1,849,412   |
| Game Providers Fee                    | 505,297     | 541,361     | 573,392     | 601,638     | 627,094     | 655,678     | 701,130     | 723,331     | 740,192     | 754,833     | 767,690     | 775,560     |
| Payment Processors Fee                | 1,255,469   | 1,359,233   | 1,454,615   | 1,542,045   | 1,623,691   | 1,697,701   | 1,815,388   | 1,872,872   | 1,916,527   | 1,954,437   | 1,987,727   | 2,008,103   |
| Platform Fee (10%)                    | 388,690     | 416,432     | 441,071     | 462,799     | 482,380     | 504,367     | 539,331     | 556,409     | 569,378     | 580,641     | 590,531     | 596,584     |
| Affiliate Payments & User Acquisition | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     | 440,000     |
| CPA per player                        | 11          | 11          | 10          | 10          | 10          | 9           | 9           | 9           | 9           | 9           | 9           | 9           |
| Other Operating Expenses              | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      | 90,000      |
| Net Monthly Result                    | -152,971    | -140,220    | -88,047     | -35,731     | 17,019      | 92,389      | 135,535     | 156,608     | 172,613     | 186,511     | 198,715     | 206,185     |

| 3RD YEAR PROJECTIONS                      | Month 25   | Month 26   | Month 27   | Month 28   | Month 29   | Month 30   | Month 31   | Month 32   | Month 33   | Month 34   | Month 35   | Month 36   |
|-------------------------------------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| Number of FTDs                            | 51,000     | 51,500     | 52,000     | 52,500     | 53,000     | 53,500     | 54,000     | 54,500     | 55,000     | 55,500     | 56,000     | 55,000     |
| Number of Depositing Players (incl. FTDs) | 110,403    | 112,634    | 114,705    | 119,937    | 122,748    | 129,940    | 133,648    | 137,180    | 140,281    | 143,231    | 145,765    | 146,598    |
| Total Deposits, EUR                       | 17,664,488 | 18,021,491 | 18,352,855 | 19,189,965 | 19,639,724 | 21,440,019 | 22,051,905 | 22,634,755 | 23,146,354 | 23,633,127 | 24,051,247 | 24,188,728 |
| Total Withdrawals, EUR                    | 12,365,142 | 12,615,044 | 12,846,998 | 13,432,976 | 13,747,807 | 15,008,013 | 15,436,333 | 15,844,329 | 16,202,447 | 16,543,189 | 16,835,873 | 16,932,109 |

|                                       |             |             |             |             |             |             |             |             |             |             |             |             |
|---------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Total Bets                            | 178,429,174 | 182,035,263 | 185,382,371 | 193,838,033 | 198,381,053 | 216,565,847 | 222,746,513 | 228,633,893 | 233,801,551 | 238,718,454 | 242,941,890 | 244,330,584 |
| Total Wins                            | 172,184,153 | 175,664,028 | 178,893,988 | 187,053,702 | 191,437,717 | 208,986,042 | 214,950,385 | 220,631,707 | 225,618,496 | 230,363,308 | 234,438,924 | 235,779,014 |
| GGR                                   | 6,245,021   | 6,371,234   | 6,488,383   | 6,784,331   | 6,943,337   | 7,579,805   | 7,796,128   | 8,002,186   | 8,183,054   | 8,355,146   | 8,502,966   | 8,551,570   |
| Bonuses                               | 1,873,506   | 1,911,370   | 1,946,515   | 2,035,299   | 2,083,001   | 2,273,941   | 2,338,838   | 2,400,656   | 2,454,916   | 2,506,544   | 2,550,890   | 2,565,471   |
| Game Providers Fee                    | 811,853     | 828,260     | 843,490     | 881,963     | 902,634     | 985,375     | 1,013,497   | 1,040,284   | 1,063,797   | 1,086,169   | 1,105,386   | 1,111,704   |
| Payment Processors Fee                | 2,102,074   | 2,144,557   | 2,183,990   | 2,283,606   | 2,337,127   | 2,551,362   | 2,624,177   | 2,693,536   | 2,754,416   | 2,812,342   | 2,862,098   | 2,878,459   |
| Platform Fee (10%)                    | 624,502     | 637,123     | 648,838     | 678,433     | 694,334     | 757,980     | 779,613     | 800,219     | 818,305     | 835,515     | 850,297     | 855,157     |
| Affiliate Payments & User Acquisition | 450,000     | 460,000     | 470,000     | 480,000     | 490,000     | 500,000     | 510,000     | 520,000     | 530,000     | 540,000     | 550,000     | 560,000     |
| CPA per player                        | 9           | 9           | 9           | 9           | 9           | 9           | 9           | 10          | 10          | 10          | 10          | 10          |
| Other Operating Expenses              | 95,000      | 95,000      | 95,000      | 96,000      | 96,000      | 96,000      | 96,000      | 97,000      | 97,000      | 98,000      | 99,000      | 100,000     |
| Net Monthly Result                    | 288,086     | 294,923     | 300,550     | 329,030     | 340,241     | 415,146     | 434,003     | 450,492     | 464,619     | 476,576     | 485,296     | 480,779     |