

COMPANY

Business Plan.

Submitted by:
Luckyroo N.V

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Executive summary

Luckyroo N.V focuses on increasing its user base in Europe by moving step-by-step to international regulated markets. Luckyroo N.V will be entering only regulated markets, firstly the marketing strategy will be focused on the Latam markets and then we'll expand in markets where AML regulations are adhered to and where it will not jeopardize the license from the GCB. The games on Luckyroo N.V cater for all audiences and there is no specific client target group Sonne N.V is focusing on.

Our projections forecast that according to the base scenario, the company should reach profitability by 2024 after receiving license from GCB.

Luckyroo N.V will enter the market with a web-site betwinner.llc and we'll be represented with the brand Luckyroo N.V

Business Summary and History

Luckyroo N.V (hereinafter referred to as "COMPANY") has been incorporated under the laws of Curacao and will seek to apply for the required gaming license with the GCB.

Vision and Mission

Our Vision of the COMPANY is to build a world – class online gambling website that can compete with the leading international brands. The COMPANY would like to provide the best customer gambling experience. The Company will be B2C operator.

COMPANY is the innovative online sports betting platform which is built by a team of professional experience group of individuals. COMPANY shall also offer leading casino games and shall be presented with an AI feature to track and best serve players.

We believe that gambling is an entertainment medium and it is our philosophy to build an friendly usability platform that automatically morphs around your behavior.

Why Curacao?

The COMPANY is determined that by acquiring a Curacao Gaming License, the company will enhance their competitive advantage in the iGaming Market, and this will open new doors to new and potential business. Apart from the internal competitive advantage – made up of an experienced and young dynamic team, the Curacao license will offer an external competitive advantage, summarised as:

- Curacao being a jurisdiction of great repute in the iGaming world;
- Curacao was the first country to regulate iGaming;
- Excellent hosting infrastructure;
- Competitive corporate tax rate.

Curacao is positioned as one of the leading destinations for iGaming operators, benefiting from its extensive regulatory framework. With the GCB recent overhaul of regulations, we strive to be at the forefront of pioneering new industry standards. COMPANY is well-positioned to take advantage of being among the first to obtain these licenses.

What is COMPANY?

The COMPANY is a gambling platform where players engage with fellow casino and sports fans in a safe and secure environment. Fans will be allowed to bet on their favourite events as well as enjoy a casino. Typical games that the fans enjoy are Soccer, Tennis, Basketball and other major sports. The goal is to have an active community, in which players can watch and play a variety of games and events. The team is dedicated to communicating with the community on all levels, including but not limited to; Analysts that provide deep insight in the growing sports genre, active support of grassroots movements, and transparent partnerships with established institutions.

- Unique Sales Proposition
- 24|7 customer care service
- instant withdrawals
- mobile-friendly
- Welcome bonuses and ongoing promotions
- Loyalty program that automatically gives rewards (will be launched soon)
- A variety betting options

Market analysis Summary

The online gaming market is rapidly expanding, becoming a significant segment within the gambling industry. As customers increasingly turn to the Internet for sports betting, slot games, and card playing, the traditional gambling model is evolving. Despite potential political and legislative constraints, the market shows potential for further growth as new regions open up and governments become more accepting of online gambling. The global growth of professional sports and associated betting markets, driven by technological advancements and consumer demand, mutually benefits both industries financially.

The iGaming industry is constantly evolving, requiring gaming operators to adapt to new developments in the market. Many countries are pursuing self-regulation approaches to ensure player protection and generate tax revenue from gaming activities. The industry continues to expand at a rapid pace, with new operators seeking market shares in their respective countries. Although the European market appears fragmented, with each country implementing its own regulations, countries like Denmark, Spain, France, and Italy have introduced individual iGaming legislations for market regulation.

Despite the global recession and the bombardment of advertisements through various channels like TV and the Internet, the gaming industry remains resilient and continues to grow, much to the satisfaction of gaming operators. Additionally, the iGaming industry is witnessing a surge in social and skill-based games. Operators are embracing this trend and constantly expanding their gaming portfolios with new games. Social games are gaining popularity among youth and young adults, creating fertile ground for further industry growth. The industry perception has shifted from purely gambling on games of chance to incorporating economic value, with players finding pleasure and enthusiasm in these games. Although regulations for these types of games are not yet fully established, many jurisdictions, including Curacao, are moving towards regulating these segments. Curacao is set to introduce new legislation to regulate social and skill-based games in the near future.

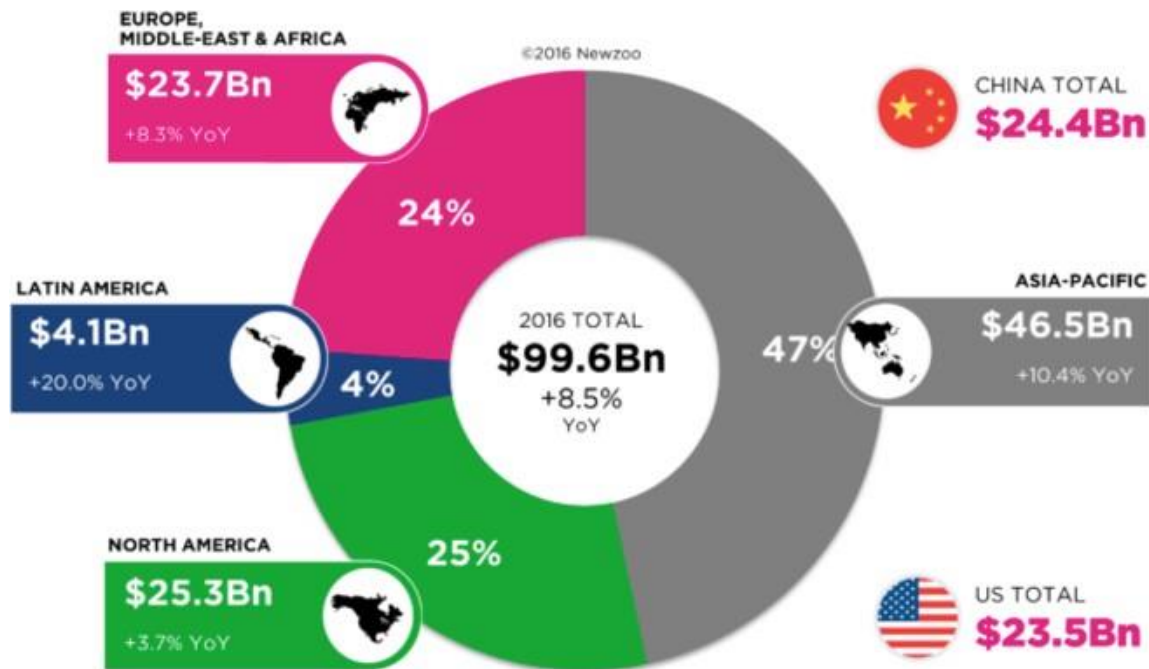
Market Segmentation

Online gambling has proven to be a global phenomenon. Currently, Europe appears to be the third expanding online gambling market. In 2016, European online gambling business operators recorded

almost a 24% increase in the total online gaming yield.

The largest market in the iGaming industry is Pacific Asia followed by North America. US legislation is easing out on its prohibition about online gambling in some sectors and territory and is therefore experiencing a massive growth.

The chart below illustrates the global online market growth tendencies:



Target Market Segment Strategy

After a deep review of the International Online Survey prepared by Ontario Problem Gambling Research Centre, we will be trying to attract and hold with us operators which main target will include:

- The typical online gambler - mature, well-educated, and solidly middle-class head of household.
- Both genders are gambling for entertainment during their free time using their own computers and Internet traffic.
- Both Genders who are willing to choose Slots and other simple online games.

Why we are applying for an GCB License

The iGaming industry has experienced tremendous and swift growth since 1990, leading to an increasing number of operators entering the gaming market. From the early 1990s onwards, numerous operators actively participated in specific markets and established themselves as prominent online operators worldwide. Curacao has been chosen by a plethora of iGaming companies due to its appealing factors, which include:

- Curacao is one of the few countries which regulates remote gaming sensibly.
- Online Gaming in Curacao has a reputation of being operated out of a well-regulated jurisdiction which safeguards the interests of both operators and players
- A very attractive fiscal regime

- An efficient and relatively inexpensive Curacao gaming license process
- Established financial services institutions (including payment gateways) for gambling companies
- State-of-the-art telecommunications infrastructure

The problem

Many existing platforms are operating without being properly regulated, and others operate outright illegally. The traditional bookmakers who are compliant do not have the full understanding of how vulnerable the new generation is, and how they have been groomed to become bettors by the game creators. The intertwining of sports and iGaming is inevitable, so doing it the right way is extremely important. When so many operators shy away from regulations and have a lack of compliance, it will eventually create big problems.

The solution

COMPANY will solve the problems outlined by being a fully licensed gambling platform dedicated to the sports market. Compliance with the highest levels of regulation will enable COMPANY to lead the way into the future, for a safer and better player experience. The team represents a broad spectrum of specialisation, across management, technology, product, design, operations and marketing. By creating a great player experience, offering a fully legal and safe place to play, COMPANY not only ensures that players are safe, but also that we are able to work with leading B2B partners to make sure the evolution of gaming is headed in the right direction. Integrity, transparency and accountability underpin COMPANY operations and these sound foundations will not only help create a great player experience but also put the business in a strong position to grow. All decisions will be made to optimise player experience, prioritising lasting relationships over short-term gains, and ensuring that the vulnerable and underaged are shielded. Through the support of discerning partners and the commitment and drive of our knowledgeable industry executives, we aim to be the business that takes the front-row position in creating a safe and fun environment for everyone in the sports gambling market and to achieve this we will:

Continue to improve our framework to ensure people do not develop a gambling addiction
 Use key influencers in the esports community to educate potential problem gamblers
 Work closely with regulators to continuously improve self-exclusion and player limits
 Keep refining our engaging platform for players to create a sustainable gaming community

Website Marketing Strategy

COMPANY will be using below strategies for generating bigger traffic on its website:

- Search Engine Optimisation (SEO). This involves producing web pages that rank well in the search engines on relevant keywords.
- Advertising. COMPANY will start with Google Adwords, which provides a low-cost entry into the internet advertising market.
- Inbound links from directories, journals or other online publications.
- Secret squirrel marketing. By taking part in newsgroups, forums, email lists etc
- Pay-Per-Click (PPC) promotion Services

Marketing Strategy

COMPANY intends to use a high impact marketing campaign which will focus on direct marketing of games to players that will generate a substantial amount of traffic on its web sites.

These strategies include the use of search engine optimization and possibly pay per click marketing. The Company's web development firm will place large amounts of linking text on the Company's website in order to achieve the best web access (ideally on the first 5 pages of Google). This strategy is technically complicated, and COMPANY will use a search engine optimization firm to develop the Company's visibility on a non-paid basis. COMPANY expects that the outsourcing company will place large amounts of linking data and text specific keywords into the business's website, which will allow the Company to appear more frequently among search engines. Additionally, the COMPANY will use several pay methods for increasing the Company's visibility. This strategy is expensive, but the results can be phenomenal if this marketing strategy is properly executed. These advertisements appear along the border and side of a website, and each time a person clicks on the website, a small fee is charged to the Company's account. This strategy will be used until the Company gains momentum. Beside Internet Marketing, COMPANY will be paying for ad space in the industry leading magazines. This will give us a chance to exactly specify when that ad will air or be published.

SWOT Analysis

The SWOT analysis provides us with an opportunity to examine the internal strengths and weaknesses COMPANY must address. It also allows us to examine the opportunities presented to COMPANY as well as potential threats.

COMPANY has a valuable inventory of strengths that will help it succeed. These strengths include: Exclusive access to the highly effective platform, flexibility in making software changes, excellent know-how and a clear vision of the market need. Strengths are valuable, but it is also important to realize the weaknesses COMPANY must address. These weaknesses include for example: a weak brand name, very high-cost factor associated with sustaining servers and Internet access and strong competition.

COMPANY strengths will help it capitalize on emerging opportunities. These opportunities include, but are not limited to, a growing population of daily Internet users, and no international trade barriers. Threats that COMPANY should be aware of include fast changing technology and new regulations and legislations.

Company shareholding structure

Organizational plan

The below is the high-level organization structure.

Key personnel and key functions' competence

All our personnel are employed with several years of industry experience. They have been active in various tasks in the gambling sector, from game production to online casino marketing. Therefore, our people have been actively involved in day-to-day business in all the supply chain of this business concept.

Compliance

Responsible for:

- Develop, implement, and enforce compliance policies and procedures.
- Monitor and assess the organization's adherence to relevant laws and regulations.
- Conduct regular compliance risk assessments.
- Provide guidance to employees on compliance matters and conduct training programs.
- Investigate and address reported compliance concerns or violations.
- Collaborate with other departments to ensure consistent compliance practices.
- Stay informed about changes in laws and regulations affecting the industry.
- Establish and maintain effective communication channels for reporting compliance issues.
- Conduct periodic internal audits to assess and improve compliance programs.
- Interact with regulatory authorities and respond to inquiries or audits.
- Evaluate and approve business practices to ensure compliance.
- Design and implement systems for monitoring and reporting compliance metrics.
- Develop and update compliance manuals, codes of conduct, and related documents.
- Oversee the implementation of compliance-related technology solutions.
- Provide regular compliance reports to senior management and the board.
- Ensure that the organization's policies align with ethical standards and industry best practices.
- Participate in the development of risk management strategies.
- Collaborate with legal counsel to address complex compliance issues.
- Lead the response to regulatory changes and ensure timely updates to policies.
- Maintain records and documentation related to compliance activities.
- Act as a point of contact for employees seeking guidance on compliance matters.

CFO -to be hired

Responsible for:

- Develop and manage the organization's financial strategy and policies.
- Oversee financial planning, budgeting, and forecasting processes.
- Manage and optimize the organization's capital structure.
- Ensure accurate and timely financial reporting.
- Supervise accounting functions, including accounts payable and receivable.
- Implement and maintain effective internal controls.
- Assess and manage financial risks.
- Conduct financial analysis and provide insights to support decision-making.

- Liaise with external auditors and ensure compliance with accounting standards.
- Manage relationships with financial institutions and stakeholders.
- Evaluate and oversee investment strategies.
- Monitor cash flow and liquidity.
- Lead financial negotiations and agreements.
- Provide leadership and guidance to the finance team.
- Participate in strategic planning and decision-making processes.
- Stay informed about changes in financial regulations and industry trends.
- Develop and implement cost-saving initiatives.
- Evaluate and recommend financial technologies for improved efficiency.

Data Protection Officer (DPO) – to be hired

Adherence to applicable legislation relating to data protection and privacy;

Responsible for:

- Oversee and ensure compliance with data protection laws and regulations.
- Develop, implement, and manage data protection policies and procedures.
- Conduct regular data protection impact assessments.
- Provide guidance and training to employees on data protection matters.
- Respond to and manage data subject access requests.
- Monitor data processing activities for compliance with privacy policies.
- Collaborate with other departments to embed privacy by design principles.
- Stay informed about changes in data protection laws and industry standards.
- Act as the point of contact for data protection inquiries and concerns.
- Work with IT and security teams to implement and maintain data security measures.
- Conduct audits to assess and improve data protection practices.
- Ensure that data processing agreements and contracts comply with data protection requirements.
- Collaborate with legal counsel to address complex data protection issues.
- Oversee and manage data breach response and notification procedures.
- Maintain records and documentation related to data protection activities.
- Assist in the development of privacy impact assessments for new projects.
- Coordinate with external regulators and authorities on data protection matters.
- Provide reports on data protection compliance to senior management and the board.
- Monitor and assess third-party data processing activities for compliance.
- Implement processes for managing data retention and deletion.
- Act as a liaison between the organization and data protection authorities.

Chief Technical Officer (CTO) – to be hired

The technological affairs of COMPANY, including but not limited to the management of the back end and control system holding essential regulatory data;

Responsible for:

- Lead technology strategy and innovation.
- Oversee the development and implementation of IT policies and procedures.
- Manage the organization's technology infrastructure.
- Ensure data security and compliance with relevant regulations.
- Supervise software and hardware development teams.
- Evaluate and implement technology solutions for business efficiency.
- Collaborate with other departments to align technology with business goals.
- Provide leadership and guidance to the IT department.

- Assess and manage technology-related risks.
- Stay informed about emerging technologies and industry trends.
- Plan and execute technology projects within budget and timeline.
- Liaise with external vendors and partners.
- Manage relationships with technology service providers.
- Lead disaster recovery and business continuity planning.
- Collaborate with cybersecurity teams to enhance digital security.
- Participate in strategic planning and decision-making processes.
- Conduct technology-related training programs for staff.
- Ensure IT support services are efficient and responsive.
- Coordinate with legal and compliance teams on technology-related matters.
- Develop and maintain IT budgets and financial forecasts.
- Promote a culture of innovation and continuous improvement within the IT department.
- Evaluate and recommend technology investments for the organization.
- Maintain documentation of technology systems and processes.
- Act as a point of contact for technology-related inquiries and concerns.

Money Laundering Reporting Officer – to be hired

Responsible for:

- Develop, update, and implement AML policies and procedures.
- Conduct risk assessments to evaluate money laundering and terrorist financing risks.
- Provide training and awareness programs for employees on AML policies and procedures.
- Oversee customer due diligence (CDD) processes, ensuring proper identification and verification.
- Implement systems for monitoring transactions and promptly report suspicious activities.
- Act as the point of contact for employees reporting suspicious transactions.
- Maintain comprehensive records of customer transactions and AML-related activities.
- Monitor and assess the effectiveness of the organization's AML program.
- Recommend improvements to the AML program as needed.
- Serve as the primary contact for regulatory authorities on AML compliance matters.
- Respond to regulatory inquiries and provide necessary documentation.
- Regularly report to senior management and the board on AML compliance status.
- Stay informed about changes in AML laws, regulations, and industry best practices.
- Establish and manage a confidential reporting mechanism for whistleblowers.
- Collaborate with other departments, such as legal, compliance, risk management, and internal audit.
- Conduct periodic reviews and audits of the AML program for improvement and ongoing compliance.
- Ensure adherence to international AML standards and recommendations.
- Work with the IT department to integrate advanced technology solutions for AML monitoring and reporting.

Risk Evaluation Process

COMPANY places a strong emphasis on effective risk management, following a comprehensive Risk Management Model outlined in the dedicated Risk Management Policy document. The Board of Directors and C-level Management, as key stakeholders, play a crucial role in overseeing and approving changes to this policy. Any adjustments to operating procedures, standards, guidelines, and technologies, consistent with the policy, may be authorized by the Chief Executive Officer.

The Board of Directors has the authority to approve the policy and undertakes annual reviews for ongoing merit. C-level Management is tasked with implementing and administering the directives in accordance with the approved policy. The Chief Executive Officer, along with all employees, bears the primary responsibility for enforcing the policy and its operating procedures.

Importantly, the policy and its procedures do not contravene or supersede any other legal or regulatory requirements imposed on COMPANY.

COMPANY advocates for effective communication, transparency, and active participation from all key stakeholders in its model risk governance. This includes the encouragement of effective challenges to model-related processes, such as risk analysis, validation, testing, development, and governance. The Board of Directors, Chief Executive Officer, and Senior Management are tasked with fostering an environment conducive to such challenges.

Appropriate change management processes are integral to model governance, particularly when implementing or altering models and related technologies. These processes cover various areas, including model development, personnel, policies, testing and validation, IT systems, regulatory requirements, and internal controls. COMPANY may engage third-party experts with specialized technology knowledge to ensure effective third-party risk management.

Meeting minutes from the Board of Directors serve as evidence of proper oversight of model risk management. These minutes are meticulously documented, providing sufficient information to demonstrate that the Board of Directors and Chief Compliance Officer are fully informed about relevant facts, comprehend associated risks, deliberate on significant issues, independently make decisions in COMPANY's best interests, and approve prior meeting minutes. This diligent approach ensures accountability and transparency in the company's model risk management practices. places a strong emphasis on effective risk management, following a comprehensive Risk Management Model outlined in the dedicated Risk Management Policy document. The Board of Directors and C-level Management, as key stakeholders, play a crucial role in overseeing and approving changes to this policy. Any adjustments to operating procedures, standards, guidelines, and technologies, consistent with the policy, may be authorized by the Chief Executive Officer.

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Legal Framework

Decisions pertaining to the Risk Management Policy and Model at COMPANY are exclusively within the purview of the esteemed Board of Directors. The governance structure ensures a clear delineation between major strategic decisions and day-to-day operations. The latter, aligned with the Risk Management Policy and other board-approved policies such as KYC, AML, and Compliance, is the responsibility of the C-level management.

To prevent potential deadlock situations, the CEO holds the controlling vote in the event of a tie among the four C-level management members, providing a decisive mechanism for swift decision-making.

The C-level management, as a practice, diligently updates the Board of Directors on significant business developments during quarterly board meetings, facilitating a seamless flow of information between the top-tier executives and the governing body.

Legal support and advice form a crucial component of COMPANY's decision-making processes. The company engages multiple corporate service providers and legal firms, each chosen based on their jurisdictional expertise relevant to the specific issue at hand. This strategic approach ensures that legal guidance is not only comprehensive but also tailored to the intricacies of the regulatory landscape in various jurisdictions.

The quarterly updates and transparent communication channels established between the Board of Directors and C-level management underscore the commitment to robust corporate governance. These measures contribute to informed decision-making, effective oversight, and the adherence to legal and regulatory standards, further fortifying COMPANY's commitment to excellence in risk management and corporate governance.

Policies and Procedures

In accordance with our commitment to regulatory compliance and transparency, COMPANY ensures that all policies and procedures will be provided to the relevant authorities within six months from the issuance of the license. This timeline demonstrates our dedication to promptly submit our comprehensive framework to the Gaming Control Board (GCB) for review and scrutiny. By adhering to this timeframe, we showcase our responsible approach to governance and our commitment to fulfilling all regulatory obligations in a timely manner. COMPANY recognizes the importance of aligning with industry best practices and regulatory standards, and providing the complete set of policies and procedures within the designated timeframe reinforces our commitment to regulatory compliance.

We understand that timely submission of these policies and procedures is crucial for establishing a solid foundation for operational excellence. Therefore, COMPANY diligently focuses on finalizing and fine-tuning our framework, ensuring that it meets the requirements of the gaming industry and embeds the

highest standards of corporate governance.

By submitting our policies and procedures within six months from the license issuance, COMPANY aims to facilitate a rigorous assessment by the relevant authorities, enabling them to evaluate our commitment to compliance and adherence to industry guidelines. We view this as a crucial step in fostering trust, maintaining transparency, and upholding the regulations set forth by the gaming authorities.

In summary, COMPANY guarantees the provision of all policies and procedures to the relevant authorities within six months from the issuance of the license, demonstrating our unwavering dedication to regulatory compliance and our proactive approach to fulfilling all obligations in a timely manner.