

Business Plan – Play UK Internet N.V.



1. Overview of the Business, Products & Services

Play UK Internet N.V. (Play UK), operating under several domains and is an independently managed online gaming company with deep roots in Curaçao, where it has been incorporated and operational since 2004. Over the past two decades, Play UK has developed a strong reputation for reliability, regulatory compliance, and a customer-first approach. The company has consistently evolved with industry trends and maintained its status as a respected entity within the iGaming sector.

Our portfolio includes several respected gaming brands, most notably **PlayHugeLottos.com**, one of the most recognized lottery platforms worldwide. This success is built on years of experience and careful attention to operational integrity, secure payment systems, and a seamless user experience. We have built our brands by prioritizing transparency, customer service, and consistent compliance with jurisdictional requirements.

From the beginning, Play UK has made it a priority to implement and continuously improve compliance frameworks—well before industry norms made them a requirement. This includes advanced Know Your Customer (KYC) protocols, responsible gaming standards, and a strong internal culture of regulatory discipline. These measures have become deeply embedded into the operational DNA of the company, shaping our internal processes, employee training, and external communication.

Play UK currently offers an extensive portfolio of products. These include online lottery entries for major global draws, which are made accessible through a user-friendly digital platform. In addition to lotteries, Play UK has started to expand into more traditional online gaming offerings such as slot machines, classic table games like blackjack and roulette, and live dealer experiences delivered through trusted providers. As demand for omni-channel entertainment grows, we are committed to enhancing our product catalog to meet and exceed player expectations.

We believe in building with intention and sustainability. Each product is launched only after passing through rigorous internal reviews and testing. This ensures our users receive a reliable, engaging, and safe experience at all times. Looking ahead, we aim to introduce new verticals, expand our range of languages and currencies, and integrate tools to further personalize the player journey.

2. Management Structure

Play UK Internet N.V. is managed by a dedicated team that brings both local insight and international industry experience. The company operates with a clear internal hierarchy, designed to provide accountability at each level of decision-making. We recognize the importance of effective governance, especially in a tightly regulated industry, and have structured our leadership accordingly.

- **Managing Director – Annemarie Heyer:** Based in Curaçao, Ms. Heyer oversees all local company matters. She ensures compliance with regulatory obligations, maintains the company's good standing, and liaises with local stakeholders. Her longstanding presence in the jurisdiction and industry-specific expertise play a central role in the firm's continuity and success.
- **GLI Staff** - Global Logistics Internet SA - Outsourced partner providing iGaming platform services and maintenance, including plug in games, marketing services, finance and customer service functions.

Combined, the management team brings more than 20 years of experience in the iGaming industry, covering operational leadership, compliance, platform development, and market expansion across regulated and emerging jurisdictions.

Each department within the company, from product to customer support, is guided by a senior team leader responsible for performance, training, and adherence to policy. This structure supports both scalability and quality assurance.

3. Business Forecast

Having operated successfully since 2004, Play UK Internet N.V. has an extensive track record of financial performance. We believe that historical performance is often a more reliable measure than hypothetical forecasts. As such, rather than using speculative projections, we will provide unaudited financial data from the past three years to demonstrate our growth trajectory, revenue stability, and investment strategy.

These records will show year-on-year growth in user acquisition, improved retention rates, and steady increases in average revenue per user. Our financial strategy has been conservative yet effective—balancing reinvestment in technology and marketing with prudent cost controls and robust reserve management.

The financial annex to this plan is a forecast of three years to show the evolution of the business.

4. Growth Strategy & Market Share Plan

Our strategic roadmap is based on gradual, responsible expansion and long-term sustainability. We are not aiming for aggressive, short-lived spikes in activity; instead, we focus on stable growth supported by intelligent market targeting, improved player experience, and ethical business practices. Play UK's expansion strategy is informed by data, shaped by regulatory feasibility, and driven by customer needs.

Currently, Play UK operates in a variety of international markets including India, Middle East and parts of Latin America. These regions represent a balanced mix of mature, highly regulated environments and emerging markets with increasing digital adoption. Our presence in these jurisdictions is the result of years of localized marketing, strong affiliate partnerships, and ongoing compliance efforts.

One of our primary focuses is to deepen our presence in markets where demand for regulated online lottery and casino products continues to rise. This involves localizing our content, adapting our payment infrastructure, and offering region-specific promotions that resonate with users. In addition to consolidating our position in current markets, we plan to expand into select Latin American, African, and Asian markets where digital access to gaming products is growing, while strictly avoiding high-risk jurisdictions.



We are investing in product innovation, with particular attention to mobile responsiveness, gamification features, and AI-based personalization engines that offer custom experiences to each user. Additionally, we are forming partnerships with trusted affiliate marketers and advertising networks to help attract high-quality traffic that converts well.

We also understand that strong internal operations are essential for growth. Accordingly, we will invest in backend infrastructure, expand our customer support capabilities, and streamline our compliance tools to manage a growing player base efficiently.

5. Key Suppliers & Material Dependencies

To deliver a secure and engaging experience to players, Play UK Internet N.V. relies on a carefully curated network of service providers. These partnerships are not only essential to our daily operations, but also to maintaining our high standards of customer service, compliance, and technological performance.

The backbone of our offering is our proprietary lottery management platform, which facilitates hedging, player account management, results tracking, and prize disbursement. This system is developed and continuously optimized in collaboration with a dedicated third-party software partner to ensure responsiveness, scalability, and regulatory alignment. Our platform has been purpose-built to manage large volumes of user data and transactions, particularly for high-profile draws such as Powerball, EuroMillions, and Mega Millions.

Payment processing is another critical component of our infrastructure. We have integrated with Worldline PaymentIQ to manage multiple globally recognized payment service providers, including Visa, Mastercard, Skrill, Neteller, AstroPay etc. Additionally, we support cryptocurrency payments through CoinsPaid, giving users enhanced flexibility. These payment systems have been selected not only for their reliability and international reach but also for their strong record of fraud prevention and KYC alignment.

Global Logistics Internet (GLI) SA is our outsourced partner providing iGaming platform services and maintenance, including plug in games, marketing services, finance and customer service functions.

Oryx Gaming is our supplier for content delivery/aggregation platform, allowing operators to access many games via single integration.

Our infrastructure is hosted on a resilient, cloud-based architecture that ensures high availability and data integrity. We work with data centers that adhere to the highest security standards, including ISO certifications and 24/7 monitoring. All user interactions are encrypted with industry-standard SSL protocols, and we employ advanced intrusion detection systems to guard against unauthorized access. We are also arranging to setup a backup of our database in Bluenap Curacao, a Tier IV data center, to comply with the substance regulations by CGA.

Each supplier agreement includes terms that address uptime guarantees, support responsiveness, and data protection responsibilities. We regularly review these relationships to ensure they align with our long-term business continuity and regulatory requirements.

6. Risk Evaluation & Management

To ensure continued regulatory compliance and operational stability, Play UK has implemented a proactive risk management approach. This framework is designed to maintain the company's license in good standing and to align with the expectations of local oversight bodies.

Risk assessments are conducted regularly across all departments, covering business continuity, IT infrastructure, payment security, player protection, and legal compliance. These evaluations are documented in a central risk register, which is reviewed on a monthly basis by both the compliance team and the executive leadership.

The compliance officer plays a pivotal role in overseeing daily risk-related operations, monitoring for red flags, and initiating responses when needed. Internal audits are conducted on a scheduled basis to provide additional assurance and identify any blind spots in our current framework.

Play UK's risk management process is not viewed as a one-time obligation but as an ongoing function that evolves with the business. It is structured to grow alongside the company and to remain responsive to market shifts, regulatory updates, and technological advancements.

7. Legal and Governance Framework

Play UK Internet N.V. maintains a strong governance framework to ensure clarity, accountability, and strategic alignment. Our governance model is designed not just to satisfy regulatory requirements, but to guide ethical and efficient business operations across all levels of the organization.

The board meets at regular intervals to review and approve company strategy, oversee compliance efforts, and ensure financial discipline. Matters that are considered of significant strategic importance—such as entry into new markets, platform changes, or alterations in ownership structure—are treated as reserved matters requiring board-level approval.

Our compliance function operates independently and has full authority to escalate concerns directly to the board. This separation ensures transparency and fosters a culture of accountability. Board members and executives are trained to understand their responsibilities not just from a business perspective, but also through the lens of regulatory compliance and player trust.

Legal advisory services are provided by **Emoore N.V.**, a respected Curaçao-based firm with expertise in corporate governance and gaming regulation. Emoore N.V. assists with all legal filings, contract reviews, and ongoing compliance consultations to ensure our operations are fully aligned with legal obligations.

Besides Emoore N.V. we also have a Legal Representative from the Global Logistics Internet (GLI) SA, who also assists with all legal filings, contract reviews, and ongoing compliance and business consultations to ensure our operations are fully aligned with legal obligations.

8. Target KPIs & Business Objectives

Performance measurement at Play UK is focused on meaningful, long-term indicators that reflect both growth and operational quality. While financial metrics are important, we also track user satisfaction, retention, and platform performance.

Among the key performance indicators, we actively monitor monthly active users, first-time deposit conversion rates, and average revenue per user. We also track behavioral metrics such as time spent on site, session frequency, and the effectiveness of our responsible gaming tools. This data is used not only for reporting, but to make strategic decisions around marketing, retention campaigns, and customer support.

Our long-term business objectives include expanding into new regulated markets, increasing player lifetime value, and maintaining operational excellence across all functions. These goals are supported by our investment in technology, compliance, and talent development.

9. Policies and Procedures

To maintain the trust of players, partners, and regulators, Play UK Internet N.V. places great emphasis on strong internal policies and operational transparency. Our key policies—ranging from anti-money laundering and customer due diligence to cybersecurity, data privacy, and responsible gaming—are written to reflect best practices in the gaming industry.

These policies are initially drafted internally by our compliance officer in consultation with external advisors including legal. Once finalized, they are subjected to an independent review to ensure they meet both legal standards and operational feasibility.

We are committed to keeping our policies current and effective. All documents will be submitted to the relevant authorities within the required timelines, and updates will be provided whenever there are significant regulatory changes or operational shifts.

Regular staff training ensures that policies are understood and followed across the organization. This proactive and ongoing approach to compliance not only protects our license but also strengthens our reputation as a responsible and trusted operator.

ANNEX A

PLAY UK BUSINESS FORECAST	YTD: 2025	YTD: 2026	YTD: 2027
Wager Lottery Income	3,851,932	4,140,827	4,761,951
Operational Costs	(2,315,610)	(2,489,281)	(2,862,673)
Operational result	1,536,322	1,651,546	1,899,278
General & administrative expenses	(416,072)	(447,277)	(514,369)
General & administrative expenses	(416,072)	(447,277)	(514,369)
Interest income loan	-	-	-
Other Income	30,450	32,734	37,644
Depreciation	-	-	-
Interest expenses	-	-	-
Exchange difference	(11,342)	(12,193)	(14,022)
Financial Result	19,108	20,541	23,622
Result before profit tax	1,139,358	1,224,810	1,408,531
Profit tax	-	-	-
NET RESULT FOR THE YEAR	1,139,358	1,224,810	1,408,531