

BUSINESS PLAN

HASEL N.V.

1. Overview business:

Hasel N.V. is a company, established under the law of Curacao on November 11, 2014, leveraging multiple gaming domains under one umbrella. Licensed under Curaçao's jurisdiction, transitioning under the new Curaçao Gaming Authority (CGA) framework as of December 2024.

The Company is a company with one business line focused on providing entertainment services in the online gaming industry and on the other hand a business line acting as exclusive re-seller of a software provider platform for other operators or software providers.

The operating domains are:

- betonbet.com
- elexbet.com
- mrbahis.com
- ngsbahis.com
- savoybetting.com

The company is targeting Turkish speakers in East Europe and Turkic regions and extending internationally.

- Market focus: Turkic regions due to strong betting demand growth.
- Vision: To become a trusted, localized, and compliant online gaming brand across target markets.

Market Trends

- Eastern Europe: High demand for sports betting and casino games, although domestic regulation restricts operations—creating significant cross-border traffic.

2. Business forecasts for 3 years

Financial Planning (3-Year Outlook)

Key Assumptions

- Market growth: Steady 10–15% YoY across target markets
- Customer acquisition costs: Moderate decline over time with brand awareness
- Initial investment: Compliance, platform upgrade, marketing

Financial Projections

Year	Revenue (USD, Millions)	Operating Costs	Net Profit
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2026	47.8	46.8	1.0
2027	50.2	48.9	1.3
2028	52.7	51.1	1.6

- 2026: Focus on compliance upgrades and brand repositioning—moderate growth.
- 2027: Begin new markets expansion; scale marketing and build regulated-ready systems.
- 2028: Full leverage of investments with solid tractions.

3. Overview of intended strategy for business growth

Market Localization

- Tailor payment methods, and promotions specifically for Eastern Europe (e.g., local languages, local branding, accepted banking/payment channels).
- Adapt for other markets with similar localized strategies.

Branding & Marketing

- Refresh branding to emphasize fairness, transparency, and compliance, reducing Curaçao stigma.
- Leverage SEO, affiliate networks, and targeted ads (especially Turkish-language ones) to absorb organic traffic.
- Build loyalty via personalized promotions, VIP programs, and localized payment options.

SWOT Analysis

Strengths

Established brand (10+ years) across several domains

Experience targeting Turkic regions and Eastern Europe

Multiple domains allow segmentation & localization efforts

Weaknesses

Curaçao license perceived as weaker vs. UKGC/MGA; reputational risk

Limited compliance infrastructure for EU regulated markets

Potential fragility if CGA tightens novel oversight practices

Opportunities

Opening of regulated Eastern EU markets; possibility of acquiring local licenses

Turkish diaspora across various markets as a natural audience

Differentiating via strong compliance, fair play, and localization

Threats

Regulatory clampdowns, especially from EU or national authorities

Targeting by watchdogs (like ACMA) or reputation damage from offshore perception

Technological risks or competition from elite-licensed operators

4. Key suppliers and material dependencies

Bank: Paymix Pro (Finance Incorporated Limited)

Platform provider: Pronet Gaming, full turnkey solution

The Company is very stable and has sufficient capital to fund the Company.

5. Risk evaluation and management:

- Regulatory framework: Operates under Curacao Gaming license, LOK
- Responsible gaming policies
- Anti-money laundering (AML) standards
- Data protection compliance (GDPR, local laws)
- Regular audits and reporting
- Regulatory changes: Maintain legal advisory
- Market competition: Innovate and adapt marketing
- Security threats: Implement advanced cybersecurity measures.
- Payment processing issues: Diversify payment solutions.

Risk Mitigation & Controls

- Regulatory risk: Stay proactive in becoming a full compliance participant (CGA updates, local licensing).

- Reputational risk: Market commitment to player fairness; publish transparency reports if feasible.
- Market risk: Diversify beyond Turkic regions; consider regulated EU niches.
- Operational risk: Invest in resilient infrastructure, fraud prevention, and customer support.

6. Legal and governance framework:

- Law of Curacao is applicable
- Continuous monitoring of legal landscape for updates

7. Target KPI and business objectives:

Licensing & Compliance

- Transition fully into CGA's compliance framework
- Implement robust KYC/AML, responsible gaming tools, and transparent user protection measures.

Technology & Operations

- Strengthen platform performance and security—especially mobile responsiveness for key markets.
- Centralize operations across domains to optimize costs while maintaining localization.

Implementation Timeline (2025–2028)

2025 (Q4)

- Complete CGA transition and enhancements to platform and compliance.
- Begin localized branding overhaul and Eastern European market-focused campaigns.

2026

- Enhance Eastern European operations;
- Apply for additional licensing in one or two key regulated jurisdictions.

2027

- Expand into neighboring regions (e.g., Eastern Europe, diaspora-heavy countries).
- Optimize partnered marketing and affiliate networks.

2028

- Consolidate market positions; maximize revenue from existing operational base.
- Maintain regulatory alignment and explore diversification (e.g., esports, financial products).

8. Policies and Procedures:

- Business Continuity Plan (BCP):
 - Clear documentation of critical processes, responsible personnel, and contingency steps.
 - Regular testing of backup procedures, disaster recovery drills.
- Disaster Recovery and IT Resilience:
 - Use of redundant data centers, cloud-based failover systems.
 - Regular data backups, off-site storage, and fast recovery protocols.
- Operational Risks:
 - Monitoring of system performance; pre-emptive maintenance schedules.
 - Clear escalation procedures for technical failures or service interruptions.
- Financial Loss Control:
 - Strict financial controls and audit processes to prevent fraud and misappropriation.
- Training & Awareness:
 - Regular staff training on security, data handling, emergency procedures.
- Vendor & Supplier Risk Management:
 - Diversification of technology, payment, and content suppliers.
 - SLAs with penalty clauses for non-performance or interruption.

Summary

The company has a solid presence since 2015 and a portfolio of domains targeting various Turkic regions and Eastern Europe, is well positioned to grow—even within stricter regulatory landscapes.

Key success factors include robust compliance, localized market strategies, possible additional licensing, and scalable technology.
