



BUSINESS PLAN

CARTWHEEL BV.

Domains: instacasino.com, casinoclown.com, betclown.com

CONTENTS

Executive Summary	2
Licensing	2
Market Analysis	2
Problem Summary	2
Solution Summary	2
Market Summary	3
Competition	3
Business Model:	3
Challenge	3
Our Solution	3
Target Markets	4
Project Highlights	4
List of suppliers:	5
List of Processing Solutions:	5
Team:	5
Financial Projections:	6
Summary AVS, KYC and AML guidelines	6
Overview	6
Risk Categories	7
Guidelines	7
Conclusion:	7

EXECUTIVE SUMMARY

Cartwheel BV will be a legally registered and incorporated B2C iGaming operator company based in Curacao. The company's mission is to become a leading player in the online gambling and gaming industry by providing a secure, entertaining, and responsible gaming experience to players worldwide. The company's core values will revolve around transparency, integrity, and customer satisfaction.

Mr. Kristian Savona Ventura, the Company's Ultimate Beneficial Owner, is the founder of other iGaming ventures. As a beneficial owner of previous iGaming ventures, Mr. Savona Ventura has a deep understanding of the industry's intricacies, challenges, and opportunities. He has firsthand experience in developing and operating online gaming platforms, ensuring compliance with regulations, and implementing cutting-edge gaming technologies.

We are a team of highly experienced online gaming operators. The team has the right mix of technology expertise, regulatory compliance experience, business development, finance as well as a few marketing gurus with a strong track record in customer acquisition and brand execution.

LICENSING

In terms of licensing, we have chosen to pursue a Curacao license for several reasons. Firstly, Curacao is a well-established and reputable jurisdiction known for its long history of regulating online gaming. It has a solid framework in place that provides a balanced approach to licensing and ensures fair play, player protection, and responsible gaming practices.

Secondly, a Curacao license offers flexibility and broad acceptance in many international markets. It allows us to target a wide range of jurisdictions, expanding our potential customer base and revenue opportunities. Curacao's license also enables us to offer a comprehensive suite of online gaming products and services, including casino games, sports betting, and more, all under one regulatory framework.

Lastly, the Curacao license aligns with our strategic vision of delivering a secure and transparent gaming experience to our customers. We believe that obtaining a Curacao license demonstrates our commitment to maintaining the highest standards of integrity, compliance, and player protection.

By obtaining a Curacao license, we are confident in our ability to establish a successful and reputable online gaming platform that will meet the needs and expectations of players worldwide.

MARKET ANALYSIS

PROBLEM SUMMARY

There are many online gambling operators globally, offering a homogeneous product and gambling experience to their customers; game providers and same promotions to customers often have similarities, the products are to great extent the same and when it comes to sports betting, of course the events and markets are also the same all over the world. We believe that in this environment, the user experience, branding and technical performance, together with customer service, will be differentiators.

SOLUTION SUMMARY

Our service provider's proprietary technology platform together with an experienced product and marketing team will be able to deliver innovative solutions, securely and controlled in an efficient delivery timeline to our players. By launching one brand at a time, we secure the quality of the site, the products and most importantly the player experience.

We focus on fast and secure services throughout the entire user journey. With reliable payments providers, close to real time KYC checks, fair promotions, and top tier online gaming providers. Cartwheel BV casino brands cater both for the experienced recreational players as well as to new players by keeping an easily navigated site and intuitive user flow.

MARKET SUMMARY

InstaCasino.com is targeting financially stable males between the ages of 23-45 and enjoy good quality online gaming experiences. The core target group will be seasoned punters, who expect fast and flawless customer service and deposits and withdrawals.

CasinoClown.com and BetClown.com will target thrill seekers that appreciate the unpredictable promotions of our clown brand ambassador.

COMPETITION

The competitive landscape within the gaming industry is fierce. However, the gaming industry is still both fast growing as well as evolving into more niche markets by both regulatory landscape and also product offering. By operating a company with a clear vision and focus on a set of regulatory landscapes with a platform catering for local entrepreneurs operating target group adapted brands, we are confident to bring more success stories to the industry.

BUSINESS MODEL:

Entering into the online casino industry today is still a *problem worth solving*. We have the knowledge, the skill, and the financial means to deliver on our set long term plan.

CHALLENGE

- The fierce competition in the industry causes extreme marketing costs and often irrational bonus promotions. The marketing in the online gaming industry is often generic, irrelevant, and inefficient. Many operators go for loss making deposit bonuses that appeal to the wrong type of players.
- The industry's dependency on affiliates for traffic decreases profit margins. Technical platforms and IT-development are outdated. CPA is constantly increasing in almost all markets.

OUR SOLUTION

- The loyalty and long-term relation between a customer and online casino is built from the first deposit bonus. By targeting the right type of healthy players and providing for them an attractive bonus will create profitable contributions and loyal players. It is more sustainable both from a business perspective as well as responsible gaming perspective, to have players depositing amounts they can afford a multiple of times, than having bonus hunters chasing risk amounts. Hence, our promotions and segmentation models will be based on turnover, and not net losses.
- A healthy returning player is the foundation of a healthy business. With focused target groups and offerings, we know that responsible gaming is the route to long term success.
- Focused and targeted marketing strategy via the key channels (PPC, Programmatic, Media, to us known affiliate networks) which leads to lower cost per acquisition (CPA).
- Strong CRM operations supported by industry leading Business intelligence and data science to ensure optimal retention efforts.

TARGET MARKETS

The main markets at launch will be Norway, Finland, Hungary, Brazil, and Peru. To capture a broader international market, we will launch a Global English site that accepts players from various countries. This will serve as our primary platform for targeting English-speaking players worldwide.

Competition

There are several operators who have targeted the markets actively for 10-20 years, whilst there are fewer operators who have entered the markets over the past 3-5 years. Our view is that there is a gap in the market between the established operators' running on old technical platforms, and the customer need and demand.

Our Advantages

- Strong independently operated platform product designed for the markets we launch in. Our team and network have extensive experience from operating leading brands in our target market.
- Attractive design of Instacasino.com with unique player journey features.
- Unique, segmented, tailored approach for retention.

Execution

A) Marketing Acquisition Plan

- Programmatic buying to our target groups
- Buying multi platform real time
- PPC advertising
- SEO network to build with inhouse competence
- Video ads direct to target audiences in native languages
- Premium marketing builds brand awareness organically
- Affiliation through our extensive network

B) Marketing Retention Plan

- Segmentation of players per market
- Data and analysis driven approach
- Daily, weekly, monthly promotions to reduce churn
- Leaderboards and tournaments for active players
- Anti-churn actions (reactivation by email, sms)

PROJECT HIGHLIGHTS

- Launch a new casino brand, with a high focus on providing fast quality player services.
- The company is founded by an experienced team with proven expertise including C-level positions at some of the most successful online gaming companies.
- The brand is global and targets high achieving individuals who identify themselves as being thrilled seeking, exciting and having a fast-paced lifestyle.
- Everything from the design of the website, bonus offering to customer service are structured to be easily understood and intuitive to interact and play with.
- Our main product focus is RNG and live casino games with the ambition to offer the highest quality of games from the top tier providers in the industry.

- Our new powerful platform will enable excellent CRM capabilities, customer user journeys and real time analytics.
- We will have a high focus on high net value customers by providing exclusive service and benefits through our own dedicated in-house high-value player team.

LIST OF SUPPLIERS:

We are preparing integrations and working on commercial agreements with;

- Yggdrasil
- Evolution gaming
- PlayNGo
- PragmaticPlay
- Microgaming
- Reevo - Gaming aggregator
- TG Labs
- Solitics
- Smartico
- Zendesk
- MyAffiliates – Affiliate marketing software platform
- PayDirection – Payment operations

LIST OF PROCESSING SOLUTIONS:

- Payments IQ - payments aggregator
- Jeton
- Mitek - KYC provider
- Threatmatrix

TEAM:

Cartwheel BV will be operated by a team of seasoned industry experts. Business operations will be split for marketing acquisition purposes and marketing retention (Operation). Other channels such as Regulatory and Legal, Finance, Customer Service, platform development, will be an integral part of two teams running the business on a daily basis.

Cartwheel BV

Director(s) – (Outsourced – EM Group)

Technical platform & customer services	Finance, AML, MLRO & Compliance	Customer acquisition	Marketing, concept and branding
Spinwheel Ltd. (CY)	(Internal resources, Cartwheel BV)	Nordic Affiliates Ltd (MT)	Consultants from Digital Taverna Ltd (MT)

FINANCIAL PROJECTIONS:

Our financial projections are based on a portfolio of 3 brands launching in 2024:

InstaCasino – projected to launch in June 2024; and

CasinoClown and BetClown– projected to launch in September 2024.

	2024	2025	2026
Net Gaming Revenue	11,370,000	15,320,000	19,670,000
Platform Fees	(1,320,000)	(1,990,000)	(2,560,000)
License Fees	(1,090,000)	(1,230,000)	(1,570,000)
PSP Fees	(640,000)	(1,070,000)	(1,380,000)
Tax	(30,000)	(80,000)	(100,000)
Gross Profit	8,290,000	10,950,000	14,060,000
Marketing	(6,390,000)	(7,220,000)	(8,260,000)
Support / CRM / Risk	(930,000)	(1,440,000)	(1,620,000)
Administrative Expenses	(480,000)	(730,000)	(960,000)
EBITDA	490,000	1,560,000	3,220,000

SUMMARY AVS, KYC AND AML GUIDELINES

OVERVIEW

As part of our company's approach to AML and CFT, various risk mitigations and controls will be utilized to mitigate and manage risks faced by the company.

We will risk assess in accordance with all international rules regarding Anti Money Laundering ("AML"), such as however not limited to the Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, and amending Directives 2009/138/EC and 2013/36/EU (hereinafter:

the "Fifth Anti Money Laundering Directive" or: "5AMLD") and the National Ordinance Identification when Rendering Services (NOIS) and the National Ordinance Reporting Unusual transactions (NORUT).

RISK CATEGORIES

Our company MLRO will perform an AML & CTF risk assessment which will be reviewed on an annual basis, and when needed, by the Board of Directors. This Risk Assessment will seek to identify the potential risks in the following areas:

- Customer risk.
- Geographical risk.
- Product risk.
- Payment risk.
- Employee risk.

GUIDELINES

We will follow and continuously update our AML and Responsible Gaming policies according to regulation and best practices. As set out in the business plan, we understand and are fully committed to well working and detailed Responsible Gaming processes that will create a more sustainable environment both for our players as well as a healthy company culture for our employees.

Our customer journeys are integrated with industry leading providers like Mitek (previously Hooyu) to enable us to verify identity, payments instruments and further enhanced due diligence (EDD) checks if necessary.

In addition to the payment aggregators and PSP's security measures, we will also be using fraud tools, to detect and block fraudulent money transactions, fraudulent players, bonus abusers and more.

Please find enclosed the following draft policies:

Appendix A - Draft Responsible Gaming Policy

Appendix B - Draft AML Policy

Appendix C - Draft AVS Policy

CONCLUSION:

The business plan for Cartwheel BV showcases the company's comprehensive approach to becoming a leading B2C iGaming operator in Curacao. With a strong focus on regulatory compliance, diverse product offerings, effective marketing strategies, and exceptional customer support, the company aims to attract and retain a global player base while maintaining financial sustainability and growth in the competitive iGaming market.