



CRISTAL GAMES N.V.

Business Plan

Aldo Biagini

CRISTAL GAMES N.V. KAYA W.F.G. (JOMBI) MENSING 24 UNIT A, CURACAO

Contents

Company Details	1
Main Contacts	1
Business Plan Objective	1
Executive Summary	2
1.1 Introduction.....	3
1.2 Mission Statement.....	3
1.3 Curacao Jurisdiction.....	3
2. Products and Services.....	4
2.1 Platform & Content.....	4
2.2 Prospective game providers.....	4
3 Cristal Games Control (Ownership) and Corporate Structure	5
3.1 Control (Ownership) Structure.....	5
3.2 Corporate Structure.....	5
3.3 Company Management Structure Showing Key Management Roles and Reporting Lines.....	6
4 Marketing & Sales Plan	7
4.1 Influencers / Affiliate Program.....	7
4.2 Market expand.....	7
4.3 Potential counterparties.....	8
5 Systems and Payments	8
5.1 IT infrastructure.....	8
5.2 Payments and Counterparties.....	8
6 Regulatory Compliance	8
6.1 Rules & Regulations.....	8
6.2 Compliance procedures.....	9
7 Financial Forecast	10
7.1 Source of Funds.....	10
7.2 Financial estimation.....	11

Company Details

Cristal Games N.V. registered registered at Kaya W.F.G (Jombi) Mensing, 24 Unit A, Curacao

Chamber of Commerce Number: 161111

Date of Incorporation: 13/06/2022

Main Contacts

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Business Plan Objective

This document is being provided with the precise intention to relicense with GCB. Currently, Cristal Games N.V. holds a sublicense with Gaming Curacao (365/JAZ), under the sublicense number GLH-OCCHKW0701022023 to offer remote gaming services in Brazil and Mexico

Executive Summary

Cristal Games N.V. (**hereinafter referred to as “Cristal Games”**) is a company incorporated under the laws of Curaçao. Cristal Games N.V. aim is to offer online gaming services under a sub-license issuing by Gaming Curacao (365/JAZ).

Cristal Games directly owns Facilino.com (www.facilino.com), and Aposta1 (www.aposta1.com), and focuses on being fully operational on 1st April 2024.

The target market will be Brazil and Mexico. The target market will be expanded as the company grows.

Cristal Games is confident that by providing players with an excellent user experience and adhering to the regulatory rules and regulations, Cristal Games will become one of the top online gaming operators.

It is anticipated that obtaining this license will provide peace of mind to the players and partners, knowing that they are dealing with a responsible operator that is supervised by regulators and where the players are given due consideration and respect.

1.1 Introduction

1.2 Mission Statement

Cristal Games has a well-grounded set of corporate values that will be accessible for clients and staff. Based on those values, Cristal Games's mission statement is as follows:

Cristal Games shall have an uncompromising commitment to excellence. Cristal Games will ensure to provide high quality services to its clients. The triumph of Cristal Games can only be achieved with happy clients.

Integrity and honesty will be at the heart of Cristal Games N.V. Cristal Games will hire experts who will be bound by solid commitment. This is important to allow Cristal Games to closely monitor the developments of its clients' and to scrutinize their continued compliance rigorously.

Cristal Games will be a dynamic organization. Cristal Games culture will be dynamic and flexible. 'Cristal Games continuously assesses its services to ensure continual relevance to its clients'.

Confidentiality is important. Cristal Games will implement robust systems to safeguard its client's information.

1.3 Curacao Jurisdiction

Cristal Games selected the Curacao jurisdiction as its licensing region, due to various key factors:

- **Cost-effective:** The fees associated with obtaining and maintaining a Curacao gambling license are often lower compared to licenses from other jurisdictions.
- **Taxation:** Curacao offers favourable tax rates for gambling operators. This can result in significant cost savings compared to jurisdictions with higher tax rates on gambling revenue.
- **Flexibility:** Curacao offers flexibility in terms of the types of gambling activities covered by the license, including casino games, sports betting, and online lotteries.
- **Global Recognition:** Curacao license provides a level of credibility and recognition in the online gambling industry. Many players are familiar with Curacao-licensed casinos and may feel comfortable playing at sites with this license.
- **Infrastructure:** Curacao has developed a solid infrastructure to support the online gambling industry, including regulatory frameworks, legal support, and technical infrastructure.

1.4 A note from the CEO

Cristal Games will provide innovative gaming experiences for the new players that are used to video games and mobile gaming. It's a mobile first casino and sportsbook that appeals to players from the 80s

and 90s that now are part of the workforce and have smartphones as their primary device.

2. Products and Services

2.1 Platform & Content

Cristal Games N.V. intends to offer its gaming platform to players in Brazil and Mexico who wish to play Slots, Casino, Live Casino, Sports Bettings, Virtual sport and Esport games. Cristal Games N.V. gaming contents will be marketed under www.aposta1.com and www.facilino.com.

The content and software platform used under www.aposta1.com are provided by some of the most reputable content and software providers that possess all the appropriate licenses and tests, such as:

Name of the game provider	Type of game
Netent	Slots
Evolution Gaming	Live Casino
Spribe	Instant Games
Play'n Go	Slots
Pragmatic	Slots / Live Casino
PG Soft	Slots
Caleta	Bingo
GlobalBet	Virtuals
NoLimit City	Slots
Hacksaw	Slots / Scratch cards
Habanero	Slots

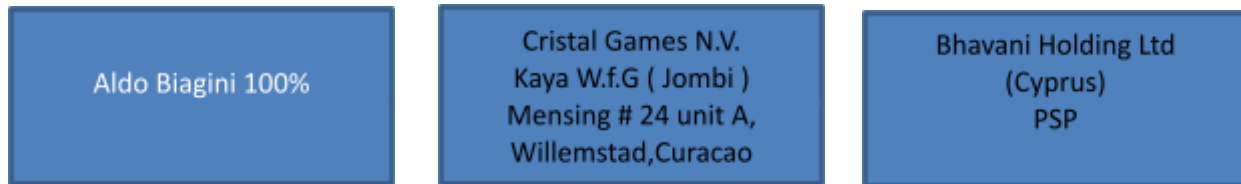
2.2 Prospective game providers

Cristal Games N.V. is not planning to integrate new games in the nearest future, but potentially considers integration with:

- SoftSwiss - Dama N.V.;
- Slotegrator - WESTHART VENTURES LIMITED;

3 Cristal Games Control (Ownership) and Corporate Structure

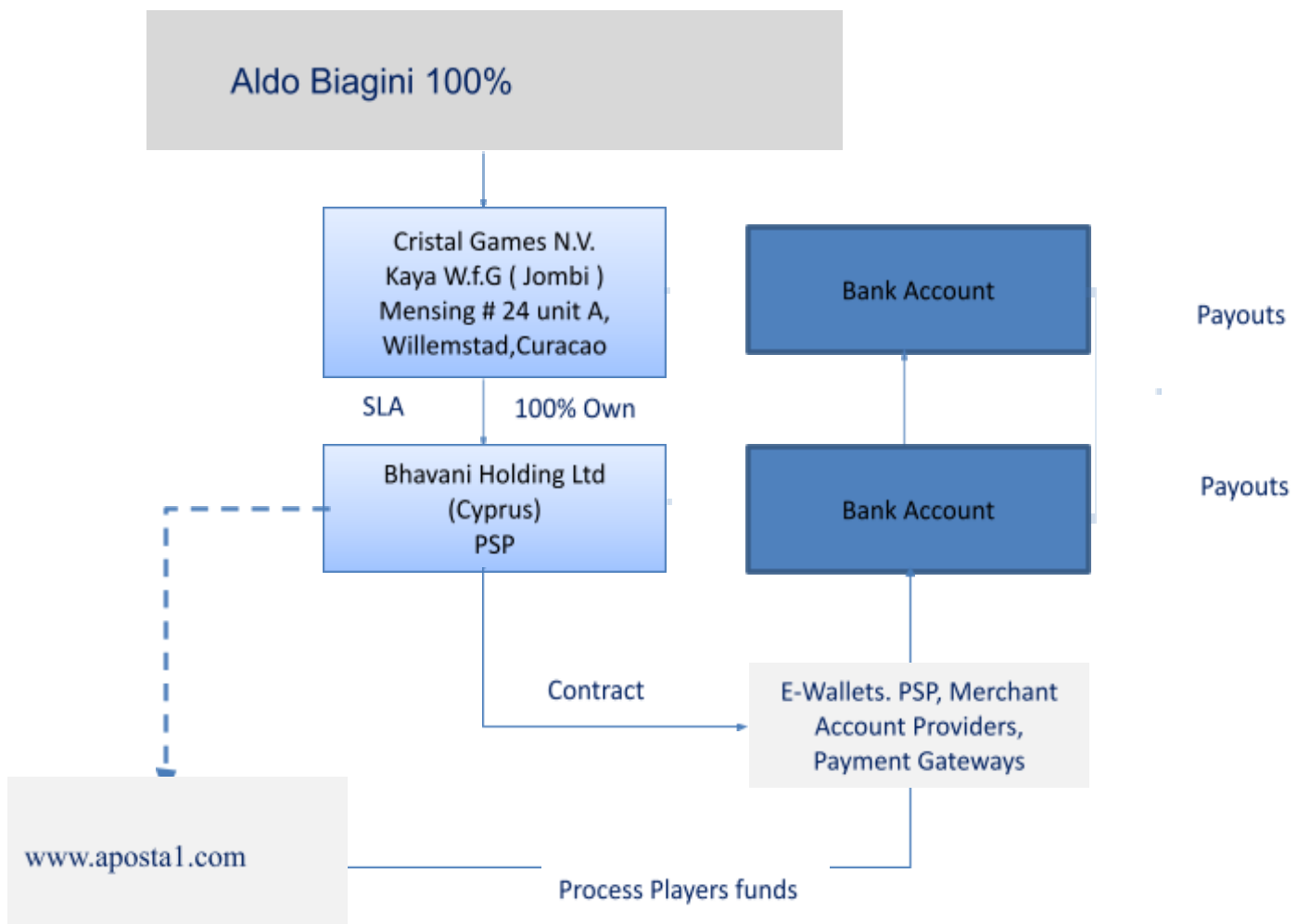
3.1 Control (Ownership) Structure



1. Mr. Aldo Biagini is a 100% owner and controlling person for Cristal Games N.V.

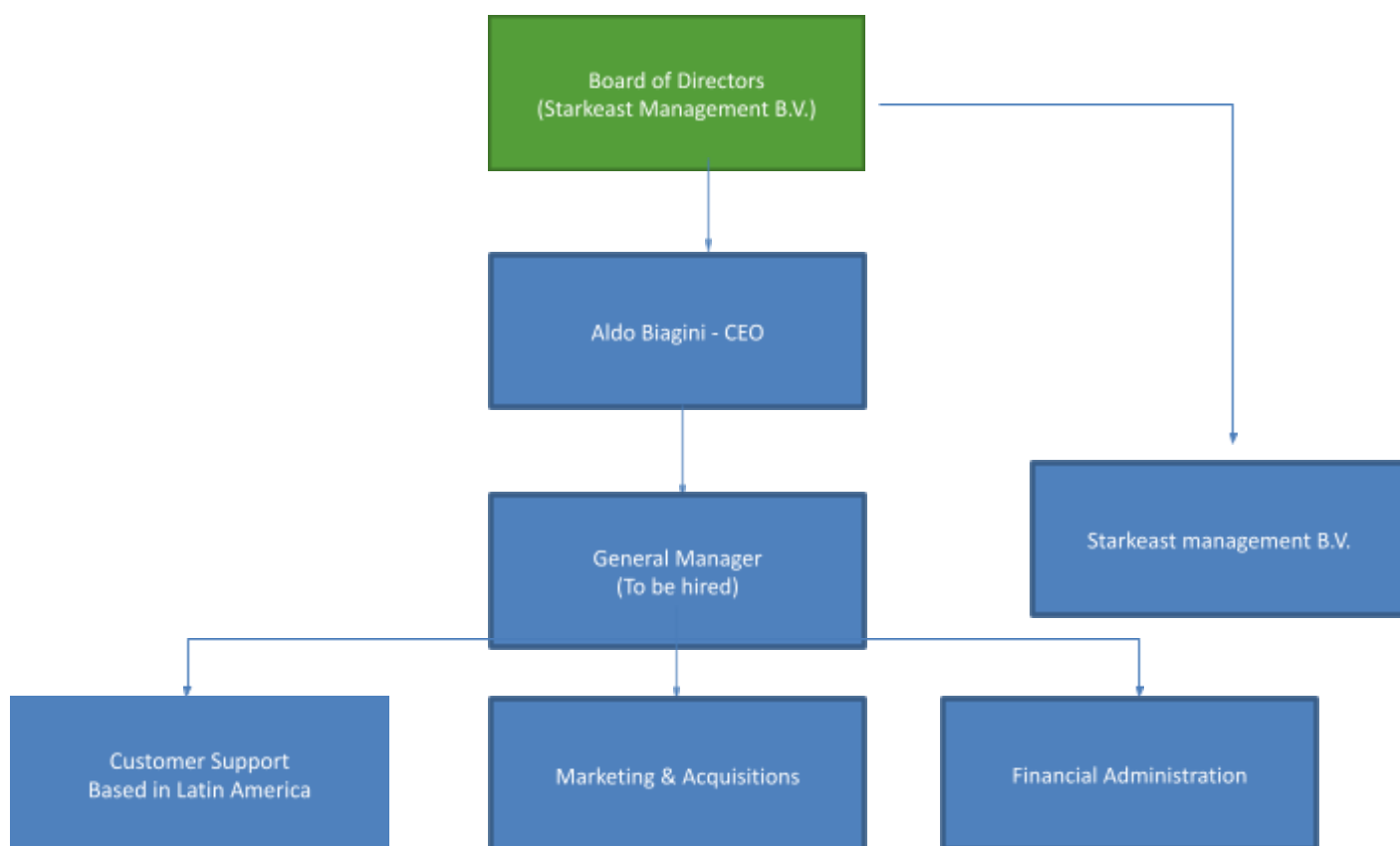
In addition, the shareholder's register confirming that Cristal Games' owner and controlling person are sent along with the Business Plan.

3.2 Corporate Structure



1. Mr. Aldo Biagini is the 100% owner of Cristal Games N.V. in Curacao which will be the entity holding the Curacao Gaming License issue by Gaming Curacao (GC)
2. Cristal Games N.V. is 100% owner of Bhavani Ltd (Cyprus entity) which will be the subsidiary entity in Cyprus acting as the PSP for Cristal Games N.V.
3. Cristal Games N.V. will instruct Bhavani Holdings Ltd to function as a Payment processor through an SLA.
4. Bhavani Holdings Ltd will be the collector of payments flowing from the E-Wallets, PSP's Merchant Account providers.
5. Bhavani Holdings Ltd will hold a bank account in its name and from this account all expenses will be paid out (for instance, contracts, License, Marketing, Leasing Agreements, etc.)

3.3 Company Management Structure Showing Key Management Roles and Reporting Lines



Cristal Games N.V. will be comprised of the following departments:

- General Management
 - Aldo Biagini (UBO) – Chief Executive Officer
 - Starkeast Management B.V. – Chief Compliance Officer
 - Starkeast Management B.V. – CSP
- Customer Service
 - Maintenance and Support (2 employees)
 - Customer Support (2 employees)
 - Risk and Compliance (2 employees)
- Marketing

- Head of Marketing (to be hired)
 - Head of Acquisitions (to be hired)
- Financial & Administration
 - Accountant
 - Payroll

Aldo Biagini will lead a team of 5-10 employees until the operation grows.

4 Marketing & Sales Plan

It is obvious that online gaming operators reached their customers through intense marketing campaigns. Cristal Games N.V. will utilize some of the most successful marketing channels (such as; Viral Marketing, Social Platforms, Affiliate programs, Grant of coupons, influencers (Sport, Social Media) to reach the targets in Brazil and Mexico.

The marketing & sales will be held in each target market to adapt the communication to the local specifications. As the primary target markets are Brazil and Mexico, the marketing team will consist of persons in these particular countries. They will be hired as the business advances (between the second quarter of 2024 or in the third quarter of 2024).

4.1 Influencers / Affiliate Program

Cristal Games will develop partnerships with experts and influencers which can drive the company to more publicity. Among these influencers there are famous sports journalists, former soccer players, social network influencers, famous actors, and famous musicians. This approach is supposed to bring credibility to the brand from scratch and a substantial number of users.

Furthermore, Cristal Games will apply the affiliate program which means referral campaigns for users to recommend the platform in exchange for credit. Additionally, Cristal Games will also used the concept of granting credit coupons for users to enter and test the platform.

4.2 Market expand

It is obvious that Cristal Games' initial focus is on targeting the audience in Brazil and Mexico. However, Cristal Games N.V. was born with a global and diverse DNA. Therefore, Cristal Games will seek opportunities to amplify its presence in other jurisdictions (such as in the LATAM and Africa regions) as the company's activities grow.

It is evident that Europeans players are well adapted to sportsbook gaming. On the contrary, In the LATAM, the presence of fantasy products has been growing year over year. Hence, Cristal Games will enter the LATAM market, targeting Esports and Virtual sports gaming players at a

later stage.

4.3 Potential counterparties

At the beginning and later stages is planning to collaborate with the following companies, i.e.:

- Blexr LTD – well established network of SEO websites in Europe;
- KaFe Rocks LTD - well established websites network in Europe and LATAM;
- ODDSPEDIA AD - well established websites network in Brazil;
- DreamLead Media - well established websites network in Brazil
- Joelsson Media Group - SEO websites network and bloggers network for Europe;
- Game Lounge - well established websites network in Europe;
- House Tech Ads LTD - well established websites network in Europe and LATAM.

5 Systems and Payments

5.1 IT infrastructure

The technology, IT infrastructure, and technical development will be managed by Microsoft and Amazon using their Cloud Services.

5.2 Payments and Counterparties

The payment methods that will be accepted are Bank transfer, Cryptocurrency, Pre-Paid debit & Credit Card, Pre-pay voucher methods, Ewallet and Mastercard/Visa, etc.

The payment services providers that Cristal Games intends to be used for the abovementioned payment method will be:

- Alphapo - Crypto processing for the wide range of markets;
- Dock - eComprocessing - card and bank transfer processing for the wide range of markets;

6 Financial Forecast

6.1 Source of Funds

The major investment to have Cristal Games fully operational is coming from a Loan Agreement executed between Mr. Aldo Biagini and the company. Total borrowed amount is 50 000 USD from his personal savings.

6.2 Financial estimation

Cristal Games is expecting a net small profit for the first year and a slight profit for the second year. A decent profit is expected as the 3rd year projection.

	Year 1 (2023-2024)	Year 2 (2024-2025)	Year 3 (2026-2027)
Product Numbers			
New Registrations	40000	60000	80000
New Players (Depositors)	3800	2200	3000
Total Players	3800	6000	9000
Deposit amount	€ 1 026 000,00	€ 1 710 000,00	€ 2 700 000,00
Withdrawal amount	€ 605 340,00	€ 991 800,00	€ 1 485 000,00
Net deposit amount	€ 420 660,00	€ 718 200,00	€ 1 215 000,00
Services costs			
Bank comissions	€ 10 260,00	€ 17 100,00	€ 27 000,00
Payments fee	€ 65 510,10	€ 108 927,00	€ 170 775,00
GSP fee	€ 42 066,00	€ 71 820,00	€ 121 500,00
Platform fee	€ 21 033,00	€ 35 910,00	€ 60 750,00
Marketing cost	€ 116 820,36	€ 200 617,20	€ 344 790,00
SEO, SMM	€ 16 000,00	€ 16 500,00	€ 17 500,00
Annual License*	€ 10,500	€ 12 500,00	€ 12 500,00
Cost per communication (Email, SMS, etc)	€ 12 000,00	€ 15 000,00	€ 20 000,00
Total services cost	€ 283 689,46	€ 478 374,20	€ 774 815,00
Empoyees			
CEO	€ 30 000,00	€ 39 000,00	€ 42 000,00
Director CRM	€ 23 000,00	€ 26 000,00	€ 28 000,00
Affiliate Manager	€ 20 000,00	€ 19 000,00	€ 20 000,00
Director Financial	€ 24 000,00	€ 26 000,00	€ 28 000,00
Support Officers	€ 25 000,00	€ 26 500,00	€ 28 000,00
Total Expenses	€ 122 000,00	€ 136 500,00	€ 146 000,00
PROFIT	€ 14 970,54	€ 103 325,80	€ 294 185,00

7 Regulatory Compliance

6.1 Rules & Regulations

Cristal Games **will** ensure to act always in line with the rules and regulatory obligations. It will in turn adhere to all the Provisions and Guidelines on the Detection and Deterrence of Money Laundering and Terrorist Financing issued by the competent authorities. Cristal Games will setup a robust compliance procedure that will meet all international standards. To ensure this, tasks will be allocated and adhere to strict procedures which are explained in detail in the AML Manual.

Cristal Games will ensure to block access to the services for minors and for players from the jurisdictions strictly forbidden by Curacao eGaming Such as: USA, Netherlands, France, Germany, Cyprus, BES Island, Curacao and Aruba) and from countries listed by FATF.

Cristal Games will make sure that all the Url's display appropriate information such as Term of Service, Responsible gaming, Dispute Resolution, Self-Exclusion, Account & Payouts & Bonuses, KYC policies, Privacy and management of personal data, Fairness etc.

Cristal Games will seek independent advice prior to enter a market. Furthermore, the Curacao local director (**Starkeast Management B.V.**) will take the relevant administrative and management role in order to ensure that both companies (Cristal Games (Curacao) and Bhavani Holdings Ltd (Cyprus) will be always in good standing accordance with the local and international requirements.

6.2 Compliance procedures

Cristal Games is aware of the risk for money laundering and terrorist financing in the remote gaming. However, this risks can be mitigate as long as technological measures and controls to address the heightened risk of players risk are adopted.

It is particularly important for Cristal Games to know who their prospect players are before they will be accepted as an eligible player. Therefore, Cristal Games adopted the following mix of controls methods.

1. Players are required to provide some information in order to open an account:
 - I. First Name and Last Name;
 - II. Place and Country of Residence;
 - III. Date of Birth;
 - IV. Correct e-mail address;
 - V. Password (twice for verification purposes).
2. Players who do not register on the website are not able to play. Upon completion of the registration process and having accepted the terms and conditions and privacy policy, the player will be accepted as an eligible player.
3. Before the player is allowed to login for the first time, an e-mail is sent to the address specified in the registration form containing an activation link; it does not contain any sensitive information such as the player's username.

4. Players are required to prove their identity when they deposit or withdraw certain amounts. Documents can be submitted to the customer support email address provided on the website. Accepted documents are scanned copies of I.D. card, passport, driver's license and any recent utility bills showing the player's address, as well as any scans of credit cards or bank statements if required.
5. Players are not allowed to transfer any funds from one player account to another player account.
6. All transactions will be carried out to detect any potential money- laundering activities.
7. The customers deposit history is reviewed to confirm that no suspicious payments have been made to the customer's account. The frequency of deposits and the sum of deposits are reviewed to ensure they are within normal range for the customer based on his depositing history and the general depositing range throughout our network
8. The customer's turnover is reviewed to ensure that they have played in the casino and are not using Merchant as a method to move money
9. When possible, funds must always be refunded back to the original payment method used by the player to make a deposit
10. Suspicious Activity will be reported to the competent authority (FIU).
11. All staff will receive training on their obligations in respect of money laundering reporting and are aware of the procedures in place for escalation of any suspected incidents to the MLRO

As `Cristal Games activities continue to expand, `Cristal Games will hire more employees including a compliance/ legal officer at management level which will be in charge with compliance affairs. In the first year the complex legal and compliance activities will be outsourced, but will eventually be brought in-house on a later stage.

8. Policies and Procedures

Cristal Games N.V have developed the following policies and procedures:

- T&C
- Dispute Resolution
- Privacy Policy
- AML Policy
- Self-Exclusion Policy
- Responsible Gambling

Cristal Games N.V. also obtains independent advice prior to entering new markets. The appointed local Curacao director at Starkeast Management B.V. provides relevant administrative and management information to ensure the Temple Holdings N.V. is in good standing in accordance with local and international requirements.