



IGAMING

LICENSE

Business Plan

July 2025



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I. EXECUTIVE SUMMARY

GMFY TECH N.V. is a Curacao-based company applying for a gaming license to offer online casino and sports betting operations, with an initial focus on European countries, i.e. Finland. The company aims to become a leading brand in regulated iGaming markets by leveraging robust technology platforms, industry expertise, and tailored marketing strategies. Supported by key partnerships with top-tier providers, GMFY TECH N.V. combines a secure and enjoyable user experience with a strong operational and compliance foundation.

This business proposal is being submitted on behalf of GMFY TECH N.V. in relation to an application for the opening of the above-mentioned company with the purpose of obtaining and operating a gaming licence issued in Curacao (to cover sport and casino games).

GMFY TECH N.V. is looking to provide facilities for gambling in European countries, i.e. Finland, using one of the following url: [netbet.com](https://www.netbet.com), from which it will offers online casino games and sports betting.

2. COMPANY OVERVIEW

Legal Name: GMFY TECH N.V.

Statutory and Managing Director: eMoore N.V. (a company registered under the laws of Curacao with registration number 98108 and registered address at Groot Kwartierweg 10, Livestrong Building)

Ultimate Beneficial Owner (UBO): Mr. Regev Shayak (Portuguese citizen, residing in Portugal)

Formation: The company was established to pursue a regulated gaming license in Curacao and operate digital gambling services compliant with local and international laws.

Funding: The business is self-funded by the UBO, with reserves from personal savings,

Mr. Regev Shayak is a business leader with over 20 years of experience in business management and operational oversight across a variety of industries, including software, construction, retail, and security. Skilled in founding and managing companies in diverse international markets, with a focus on Europe, Latin America, and the Middle East. Experienced in establishing business operations. Proficient in financial management, regulatory compliance, and maintaining positive relationships with stakeholders. Strong background in working with local and international banks, extensive experience with banking compliance.

3. BUSINESS DESCRIPTION

- **GMFY TECH N.V. will operate two main verticals:**

Casino: The type of betting offered will be casino games controlled by a random number generator (RNG). The RNG in use is under the control of Gammix STS B.V. .

Sports betting: The type of betting offered will be Sport Games controlled by a risk management team. The risk management team is under the control of SBTECH.

GMFY TECH N.V. will be responsible for player registration, customer support, and handling of funds and marketing.

GMFY TECH N.V. providers will record in real time information on all the activities of the player, including all the games he played and all the money won or lost in complete detail. This information will be made available to the player via the GMFY TECH N.V. website. It's to be noted that GMFY TECH N.V. will not install nor adapt software used in gambling records.

Gammix STS B.V. will record in real time information for GMFY TECH N.V. on the Casino activities (bets/wins)

SBTECH will record in real time information for GMFY TECH N.V. on the sports betting activities (bets/wins/hold)

- **All games are accessible via desktop and mobile platforms and will be offered in English. Geo-blocking systems will be implemented to prevent access from restricted jurisdictions.**
- **Organizational Structure**
- The initial structure is lean, with plans to scale based on operational needs and regulatory commitments:
- **Key Roles:**
 - **Chief Executive Officer (CEO):** eMoore N.V.
 - **Chief Technology Officer (CTO):** To be recruited

- **Chief Financial Officer (CFO):** To be recruited
- **Chief Commercial Officer (CCO):** To be recruited
- **Compliance Officer: Mr. Arthur Namias de Crasto**

An organigram will be submitted, illustrating the reporting lines and functional separation between compliance and commercial operations. Roles critical to governance and regulatory oversight will report directly to the board.

4. MARKET ANALYSIS

Target Market: The business will initially focus on European jurisdictions with favorable regulatory frameworks and a high demand for online entertainment. The demographic target includes men and women aged 30-55, digitally active and familiar with online payment systems.

Languages Supported: English.

Excluded Markets: It's to be known that online operation can spread on multiple countries and continents, and that GMFY TECH N.V. through its partners has a system of Geo Localisation and IP addresses blocking, so that it ensures not to target **in any way** from the forbidden countries i.e. United States, Curacao, Great Britain, Italy, Israel, Turkey, Iraq, Iran.

Marketing Channels:

- Google Display Network & SEM
- Affiliate marketing and banner exchanges
- Local influencer partnerships
- Direct promotions, email campaigns, and loyalty rewards

Growth Objectives:

- Leverage NetBet's market experience to accelerate onboarding and operational setup
- Build brand equity through superior customer support and user experience
- Drive conversions using generous promotional campaigns (bonuses, free spins, accumulator offers)
- Expand into additional regions post Year 2 upon stabilization of core operations

5. OPERATING PLAN

Online Casino

Risks may arise from malfunctions of software leading to excessive winnings by players, or by bonuses which can be abused. Every precaution will be taken to ensure that quality controls and operational controls prevent malfunctions or abuse to happen on the production environment.

The algorithms for Casino games give the house the advantage and over the long run, the house will win with little risk to the Casino (GMFY TECH N.V.).

Online Sports betting

Risks may arise from players doing arbitrage or match fixing. Every precaution is taken to ensure that quality controls and operational controls prevent malfunctions or abuse to happen on the production environment.

The algorithms for Sports Betting games give the house the Ability to find and report players involved in such frauds.

Financial

With regards to handling of funds, fraud and chargebacks, this will be managed by GMFY TECH N.V. working closely with the service providers.

Limits

GMFY TECH N.V. will place limits on how much money players can place on a bet. This will help reduce the risk of fraud and also the risk of loss to GMFY TECH N.V.. GMFY TECH N.V. will always make sure that it's able to cover the winnings.

Additional limits are also placed via the responsible gaming functionality. These are the limits self-imposed by the player.

Cancellation of Games

Games can be cancelled if aborted for technical reason.

SITE SECURITY

GMFY TECH N.V. will provide the following securities to safe-guard both the clients and itself. The security measures can be broadly divided into these categories.

Legal Safety

- Clear terms and conditions on the website
- Change of term of conditions means for player to reapprove these.
-

Information Technology safety

- Regular PCI/RTS Compliance checks
- Regular intrusion testing
- Website code review
- Security hardening procedure
- Change and management policy
- Captcha on registration
- Regular checks on the CERT for 0day vulnerability and patches
- Account blocking on too many invalid passwords (3)

Financial transactions safety

- Use of payment providers that are regulated
- Encrypted connection for transaction (SSL)
- Player risk checks on deposits and withdrawal

6. MARKETING AND SALES PLAN

- **GMFY TECH N.V.** relies on the help of NetBet for the start of its operation. NetBet is an experienced online gambling company and currently hold numerous local licences in Europe, being in the market for more than 15 years.
- The company will maintain its current operations and work towards improving and expanding its operations and its offerings based on the current developments and opportunities in the online gaming industry.
- **Games Offered:**
 - online slots
 - video pokers
 - table games
 - instant games
- **Payment Processing**
 - Regarding the payment providers, GMFY TECH N.V. plans to contract with Paystrax, Rapyd, GumBallPay, Inpay, BVNK, Cryptopay, Genome.
- **GMFY TECH N.V.** is looking to:
 1. offer an excellent customer service; focus on customer loyalty and retention;
 2. advertise through banner exchange, Google advertising and affiliates; and
 3. offer bonuses, promotions and other incentives to spur business

7. FINANCIAL PLAN

Financial Projections are in Euros:

All amounts are conservative estimates designed to demonstrate self-sufficiency and scalability.

Online - Casino Only

Cost Category	2025 - Total	2026 - Total	Yr3 - Total
<i>No. of active players</i>	1,658	2,318	2,868
<i>Average bet per player per month (€)</i>	€5,838	€6,579	€6,985
<i>Player Pay-out Rates</i>	95.5%	95.3%	95.0%
<i>Tax rate</i>			
Bets	€77,628,218	€148,773,927	€210,705,277
Bonus	€523,990	€1,048,856	€1,580,290
Hold	€2,969,279	€5,943,518	€8,954,974
<u>Cost of Sales</u>			
Gaming Tax	€0	€0	€0
Transaction Fees	€118,771	€237,741	€358,199
Platform and games fee	€356,314	€713,222	€1,074,597
Total CoS	€475,085	€950,963	€1,432,796
<u>Marketing Costs</u>			
Digital Marketing	€1,350,504	€1,723,411	€1,865,535
Offline Marketing	€0	€0	€0
Total Marketing Costs	€1,350,504	€1,723,411	€1,865,535
in % of NGR	€0	€0	€0
<u>Other Overheads</u>			
Professional & Consultancy (incl. BU Leader)	€120,000	€180,000	€240,000
Salary Costs	€652,500	€804,500	€907,500
Office Costs and Supplies	€120,000	€120,000	€120,000
Curacao License Fee	€51,600	€51,600	€51,600
Total Overheads	€944,100	€1,156,100	€1,319,100
Result	€199,590	€2,113,045	€4,337,544

8. ANNEX 1

- Year-by-Year Financial Details
- Policies & Procedures Review Plan